ADMINISTRATIVE RECORD
NELSON GALVANIZING SITE

LONG ISLAND CITY, QUEENS COUNTY, NY

Prepared for:

U. S. EPA Region II
Response and Prevention Branch
Edison, New Jersey 08837

Prepared by:

Region II Removal Support Team
Weston Solutions, Inc.
Federal Programs Division
Edison, New Jersey 08837

DCN #: RST-02-F-01845
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EPA Contract No.: 68-W-00-113

JUNE 2005

Administrative Records in Local Repositories

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The Agency welcomes comments at any time on documents contained in the Administrative Record file. Please send any such comments to Jeff M. Bechtel, Response and Prevention Branch, U.S. EPA Region II, 2890 Woodbridge Avenue, Edison, NJ 08837.

For further information on the Administrative Record file, contact Jeff M. Bechtel, On-Scene Coordinator, U.S. EPA Region II, at (732) 906-6807.

NELSON GALVANIZING SITE

ADMINISTRATIVE RECORD GUIDANCE

CONTENTS

NELSON GALVANIZNG SITE
ADMINISTRATIVE RECORD FILE

MODEL INDEX OF DOCUMENTS

The index of documents contains the following information about each document:

Document #:	Site Code (three letters of site name)-Section, First Page-Section - Last Page **EXAMPLE (NGI1.1001 - 1.1002)**
Title:	Abstract of Document Contents
Category:	Document Category/Section of Administrative Record File
Author:	Writer and affiliation
Recipient:	Addressee or Public and Affiliation, if applicable
Date:	When document was created or transmitted

Note: Items in the Administrative Record are for public access, and should be removed from the file only for copying. The cost of reproduction of the documents in the file is the responsibility of the person requesting the copy.

Document #: NGI2.2001 - 2.2066
Title: RCRA Enforcement Sampling Survey, Nelson Galvanizing, Inc.
Category: Removal Response
Author: David Dugan, Environmental Scientist, Source Monitoring Section, U.S. Environmental Protection Agency
Recipient: None given
Date: April 19, 1991

Document #: NGI2.2067 - 2.2070
Title: TCLP Analytical Data Report Work Order #E109719
Category: Removal Response
Author: T.F. McCommas, Director, Robert LaFerriere, Tech. Lab. Director, Laboratory Resources, Inc., Brooklyn, CT
Recipient: Metcalf and Eddy, Tarrytown, NY
Date: September 30, 1991

Document #: NGI2.2071 - 2.2076
Title: Nelson Galvanizing - Results of Ferrous Sulfate Salts Sampling
Category: Removal Response
Author: Paul L. Kahn, On-Scene Coordinator, Preparedness Section, Response and Prevention Branch, U.S. Environmental Protection Agency, Region II, Edison, NJ
Recipient: Anne Kelly, Geologist, New York Compliance Section, Hazardous Waste Compliance Branch, U.S. Environmental Protection Agency, New York, NY
Date: October 8, 1991

Document #: NGI2.5001 - 2.5012
Title: Request for Removal Action at Nelson Galvanizing Site, Long Island City, Queens County, New York
Category: Removal Response
Author: Paul L. Kahn, On-Scene Coordinator, Response and Prevention Branch, U.S. Environmental Protection Agency, Region II, Edison, NJ
Recipient: Constantine Sidamon-Eristoff, Regional Administrator, U.S. Environmental Protection Agency, Region II, New York, NY
Date: January 30, 1991

Document #: NGI2.5013 - 2.5024
Title: Request for a CERCLA Removal Action at the Nelson Galvanizing Site, Long Island City, Queens County, New York
Category: Removal Response
Author: Jeff M. Bechtel, On-Scene Coordinator, Response and Prevention Branch, U.S. Environmental Protection Agency, Region II, Edison, NJ
Recipient: Richard L. Caspe, Director, Emergency and Remedial Response Division, U.S. Environmental Protection Agency, Region II, New York, NY
Date: September 30, 1999

Document #: NGI7.3001 - 7.3034
Title: Administrative Order on Consent, In The Matter of Nelson Galvanizing Site
Category: Enforcement
Author: Constantine Sidamon-Eristoff, Regional Administrator, U.S. Environmental Protection Agency, Region II, New York, NY
Recipient: Nelson Galvanizing, Inc., Nelson Foundry, Inc., and John T. Sweeney, Jr.
Date: March 13, 1991

Document #: NGI7.3035 - 7.3036
Title: Nelson Galvanizing Superfund Site, New York City, Queens County, New York: Request for Information Pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9601, et seq.
Category: Enforcement
Author: Michael A. Mintzer, Assistant Regional Counsel, Office of Regional Counsel, U.S. Environmental Protection Agency, Region II, New York, NY
Recipient: Anthony D. Pistone, Esq., Flushing, NY
Date: October 21, 2002

Document #: NGI7.3037 - 7.3040
Title: Subpoena Duces Tecum Subpoena Ad Testificandum
Category: Enforcement
Author: Jane M. Kenny, Regional Administrator, U.S. Environmental Protection Agency, Region II, New York, NY
Recipient: John T. Sweeney c/o Anthony D. Pistone, Esq.
Date: November 18, 2002

Document #: NGI7.3041 - 7.3042
Title: Nelson Galvanizing Facility, Administrative Subpoena
Category: Enforcement
Author: Michael A. Mintzer, Assistant Regional Counsel, Office of Regional Counsel, U.S. Environmental Protection Agency, Region II, New York, NY
Recipient: Mr. John T. Sweeney c/o Anthony D. Pistone, Esq., Flushing, NY
Date: December 9, 2002

Document #: NGI7.4001 - 7.4004
Title: Request for Consent for Access, Nelson Galvanizing Facility
Category: Enforcement
Author: Michael Mintzer, Assistant Regional Counsel, Office of Regional Counsel, U.S. Environmental Protection Agency, Region II, New York, NY
Recipient: Mr. John Sweeney, Nelson Galvanizing, Inc. and Nelson Foundry, Inc.
Date: January 31, 1991

Document #: NGI7.7001 - 7.7002
Title: Referral to Criminal Investigation Division - Nelson Galvanizing Inc. (NGI) Facility, Long Island City, N.Y.
Category: Enforcement
Author: George C. Meyer, P.E., Chief, RCRA Compliance Branch, U.S. Environmental Protection Agency, Region II, New York, NY
Recipient: William J. Lometti, Special Agent In Charge, Criminal Investigations Division, U.S. Environmental Protection Agency, Region II
Date: November 1, 1999

Document #: NGI7.7003 - 7.7006
Title: Notice of Federal Lien
Category: Enforcement
Author: Walter E. Mugdan, Regional Counsel, United States Environmental Protection Agency - Region II, New York, NY
Recipient: None given
Date: April 20, 2000

Document #: NGI10.3001 - 10.3002
Title: Notice of Public Availability
Category: Public Participation
Author: U.S. Environmental Protection Agency, Region II, Edison, NJ
Recipient: Public
Date: None given

Document #: NGI10.6001 - 10.6002
Title: None given
Category: Public Participation
Author: WasteTech News
Recipient: Public
Date: April 22, 1991

Document #: NGI10.6003 - 10.6004
Title: EPA Orders Long Island City Firm to Clean Up Chemical Hazards
Category: Public Participation
Author: United States Environmental Protection Agency, Region II, New York, NY
Recipient: Public
Date: None given

Document #: NGI11.2001-11.2002
Title: EPA Regional Guidance Documents
Category: Technical Source and Guidance Documents
Author: United States Environmental Protection Agency, Region II, Edison, NJ
Recipient: Public
Date: None Given

RCRA ENFORCEMENT SAMPLING SURVEY

Nelson Galvanizing, Inc.
11-02 Broadway, L.I.C., NY

12/13/90 and 1/16/91

Participating Personnel:

U.S. Environmental Protection Agency
David Dugan, Environmental Scientist
Stephen Hale, Env. Protection Specialist
Robert Morrell, Geologist
Roger Ennis, Environmental Engineer

Paul Kahn, OSC - EPA/Superfund
Anne Kelly, Hydrogeologist HWCB

Nelson Galvanizing, Inc.
John Sweeney, Owner and General Manager

Report Prepared By:

David J. Dugan 4/18/91

David Dugan, Environmental Scientist
Source Monitoring Section

Approved for the Director By:

Richard D. Spear, Ph.D., Chief,
Surveillance and Monitoring Branch

REPORT

Nelson Galvanizing, Inc.
11-02 Broadway
Long Island City, New York 11106

First round of sampling: 12/13/90
Second round of sampling: 1/16/91

Objective:

EPA has determined that Nelson Galvanizing, Inc. generates, stores, treats, and disposes of hazardous wastes.

The objective of this investigation was to determine if there were any violations of the RCRA regulations at the facility due to the improper storage and/or disposal of hazardous wastes.

Participants:

John Sweeney, Plant Manager and Owner of facility

Paul Kahn - EPA/Superfund
Anne Kelly - EPA/HWCB

David Dugan - EPA/ESD/SMB Sampling Team (Project Leader)
Robert Morrell - EPA/ESD/SMB Sampling Team
Roger Ennis - EPA/ESD/SMB Sampling Team
Steve Hale - EPA/ESD/SMB Sampling Team (attended 2nd round sampling)

Facility Operations:

Acids used are: Sulfuric acid; hydrofluoric acid used up to 2-3 years ago.
Caustics used are: Sodium hydroxide.
Pre-flux materials used are: Zinc ammonium chloride.

The facility receives material from customer (steel and iron).
The material is wired up into bulk loads and rough-cleaned with wire brushes.
Ten (10%) percent of the material has oil and grease, paint and other imperfections - this material is placed in a caustic bath (Sodium hydroxide).
Ninety (90%) percent of the material is placed directly into a 5% solution of sulfuric acid under heat to make the bath more effective.
After the sulfuric acid bath, the material is placed in a pre-flux solution of Zinc ammonium chloride to keep the iron from oxidizing.
The material is then dipped into a long, rectangular vat that has the pre-flux solution floating on the surface of molten zinc.
After several coats of a certain thickness, the material is allowed

to cool.

Periodically, the vat(s) are cleaned out. Heavy material settles to the bottom and is mechanically shoveled out. This material, called "dross", is collected and placed in molds and is eventually sold to a broker.

The owner, John Sweeney, claims that the facility regenerates the waste acids; that is, they collect the waste in drums and precipitates out the iron sulfate salts. Although the facility has not found a market for the salts, the acid left over is pumped back into the sulfuric acid bath. The salts are collected in drums and stored throughout the facility.

One drum labelled "hydrofluoric acid" was found nearly half-buried in the sediment; the contents and quantity never analyzed or documented. This acid was once used 2-3 years ago to treat cast-iron. When this acid was used, the facility would use approximately one drum each year.

Sampling Activities:

First round of sampling - 12/13/90:

Three drums (without lids) were pre-screened using pH paper and the acidity was pH < 2. All three drums were sampled with a dedicated jar and directly filled into a sampling container (one 8-oz. glass jar with a Teflon cap made by Eagle-Picher).

A puddle of liquid (acid) under a drum was screened with the same results. Using a dedicated polypropylene scoop, a sample was collected and poured into a sampling container mentioned above. All four of these samples (acid) were analyzed for corrosivity.

Iron sulfate salts stored in a drum was sampled using a scoop and collected in a sampling container. This sample will be analyzed for metals (Cd, Cr, Cu, Pb and Zn) using TCLP methods.

Sediment, excavated two years ago from an area within the facility, was stored in metal bins and was sampled with a scoop and collected in a sampling container. This sample was be analyzed for metals (listed above in previous paragraph) using TCLP methods.

An equipment blank was collected using deionized water poured over a disposable scoop and into a 8-oz. glass jar with a Teflon cap.

Metals (mentioned above) was be analyzed using TCLP methods.

See Diagram #1 for approximate locations of sampling points.

Results from the 1st round of sampling:

Drum of acid with label "Elektromek".....pH = 1.0
Open drum next to Sulfuric acid tank.....pH = 1.7
Open drum next to Sulfuric acid tank.....pH = 2.1
Standing liquid beneath drum.....pH = 2.2

Iron sulfate salt from drum.....Zinc = 240 ppm.

Sediment from bin.....Cadmium = 0.538 ppm.
Chromium = 0.026 ppm.
Lead = 0.667 ppm.
Zinc = 5680 ppm.

Equipment blank over scoop.....not detected

See completed analysis report for the first round of sampling as Attachment #1.

Second round of sampling - 1/16/91:

The groundwater well located on the southside of the facility building (approximately midway and near the sidewalk) was sampled. The sampling team attempted to sample this well in triplicate, but unfortunately, the well recovered insufficiently to obtain all the necessary volumes needed for all parameters. An ISCO peristaltic pump was used to evacuate the well. It was estimated that 5.4 gallons had to be purged for three volumes, but the well was "chased down" and went to dryness after two (2) gallons was evacuated. The water was a lime-green color with an average pH of 3.95. Samples were taken with a Teflon bailer and poured into 3-40 ml vials for VOAs, 1-liter glass jar for Metals and 1-liter glass jar for NVOAs. All analyses will be using TCLP methods.

1st set of groundwater samples: Analysis - VOAs, NVOAs and metals
2nd set of groundwater samples: Analysis - VOAs and metals**
3rd set of groundwater samples: Analysis - VOAs and metals**

** Insufficient volume from well to obtain NVOAs.

Three (3) drums of iron sulfate salts were randomly picked and sampled for TCLP constituents - VOAs, NVOAs and metals. Samples were collected using a disposable polypropylene scoop and placed in a 1-liter glass jar with a Teflon cap.

A sulfuric acid bath (tank) was sampled, using a coliwasa and pouring the contents into three 40 ml vials for VOAs, a 1-liter glass jar for VOAs, a 1-liter glass jar for NVOAs, a 1-liter glass jar for metals and a 8-oz. glass jar for pH analysis.

Two drums of acid, pre-screened with pH paper, were sampled with a coliwasa and analyzed for the same parameters as in the above paragraph (the sulfuric acid bath sample). All the acid samples will be analyzed using TCLP methods.

Three (3) spill areas were sampled, using disposable scoops to pick up the contaminated sediment and place the material in a 1-liter glass jar for TCLP constituents and a 8-oz. glass jar for pH.

A trip blank and an equipment blank of the bailer was taken. For the trip blank, VOAs will be run in the lab. The equipment blank will have all parameters (VOAs, NVOAs and metals) analyzed for.

Approximate location of sampling points for the second round of sampling is shown on Diagram #2.

Results from the second round of sampling:

1st set of groundwater samples.....Aluminum = 1671 ppm.
Iron = 35,000 ppm.
Magnesium = 1790 ppm.
Manganese = 366 ppm.
Nickel = 15 ppm.
Lead = 2 ppm.
Zinc = 5890 ppm.

2nd set of groundwater samples.....Aluminum = 1606 ppm.
Iron = 34,000 ppm.
Magnesium = 1790 ppm.
Manganese = 364 ppm.
Nickel = 15 ppm.
Zinc = 5852 ppm.

3rd set of groundwater samples.....Aluminum = 1623 ppm.
Iron = 35,000 ppm.
Magnesium = 1860 ppm.
Manganese = 375 ppm.
Nickel = 15 ppm.
Lead = 3 ppm.
Zinc = 6040 ppm.

Iron sulfate salt (Drum #3).....Lead = 26 ppm.

Iron sulfate salt (Drum #1).....Lead = 23 ppm.

Iron sulfate salt (Drum #2).....Lead = 84 ppm.

Sulfuric acid tank bath.....pH = 1.47
Cadmium = 4.91 ppm.
Chromium = 59.0 ppm.
Lead = 2.65 ppm.

Drum of acid #1.....pH = 1.89
Chromium = 350.0 ppm.
Lead = 4.32 ppm.

Drum of acid #2.....pH = 1.60
Chromium = 52.6 ppm.
Lead = 6.29 ppm.

Spill Area #1 (Sediment).....pH = 6.63
Cadmium = 0.15 ppm.

Spill Area #2 (Sediment).....pH = 3.22
Cadmium = 0.14 ppm.

Spill Area #3 (Sediment).....pH = 5.22
Cadmium = 0.19 ppm.

Trip blank.....Not detected.

Field blank (Bailer).....Iron = 0.14 ppm.
Zinc = 0.03 ppm.

For the complete analysis report on the second round of sampling at this facility, see Attachment #2.

Conclusions:

It can be concluded that there is currently a release of acidic material (average pH of 3.95) to the groundwater as indicated during the sampling of the groundwater well.

Several drums of acid are considered hazardous waste because the acid exhibited the characterisitic of corrosivity, or had a pH of less than or equal to 2.

The iron sulfate salts contained small amounts of lead (see results).

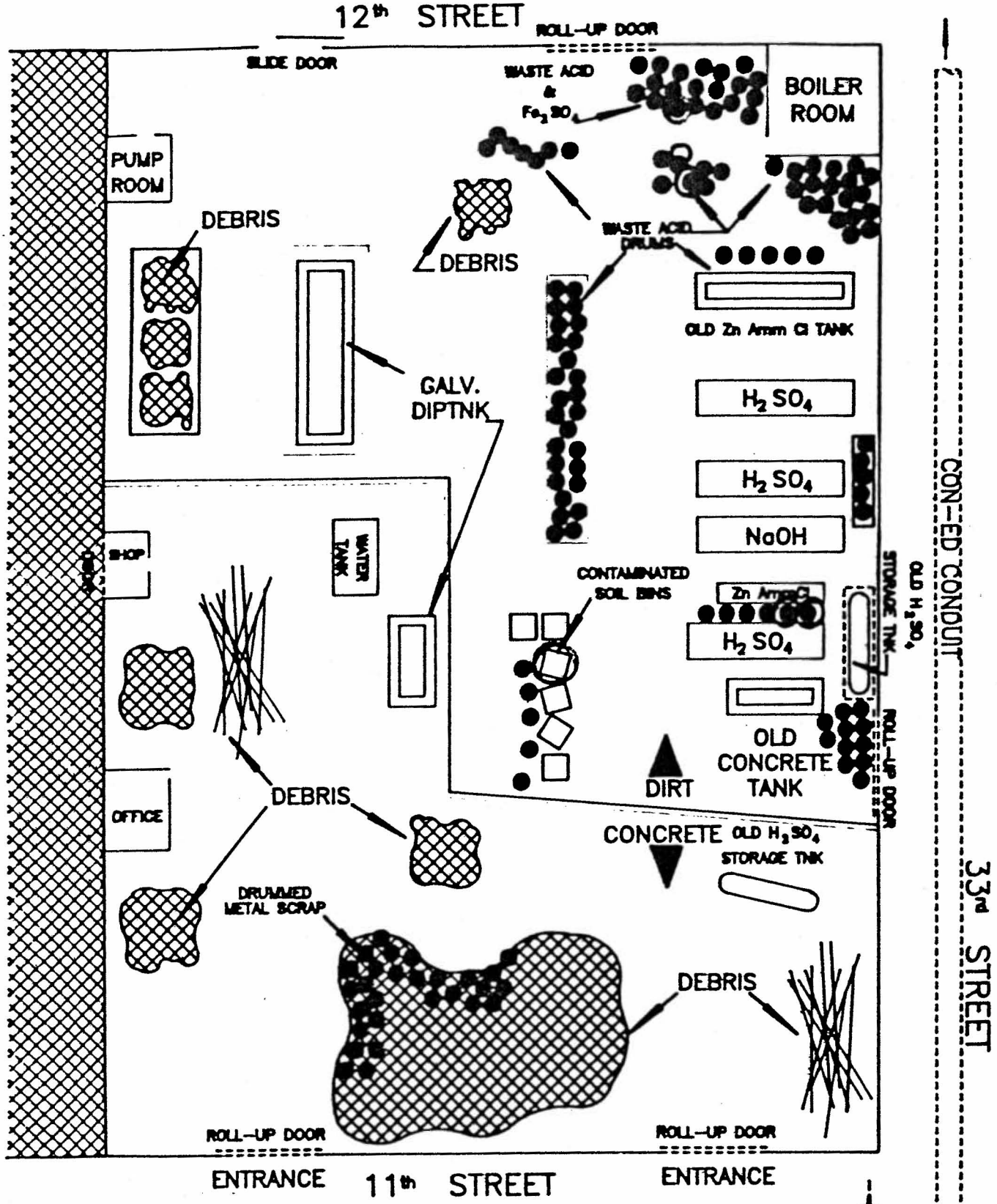
Volatile and non-volatile organics were analyzed for, but none of these constituents were found in the samples.

Attachments:

* Diagrams #1 & #2 showing sampling locations
* Photographs
* Data (Attachments #1 & #2)
* Sampling Workplan

DIAGRAM #1

NGI 2.2007



NELSON GALVANIZING

D. J. Perera, 12/20/90

Paul L. Kohn, OSC

O - DRUM SAMPLING LOCATIONS

O - STANDING LIQUID

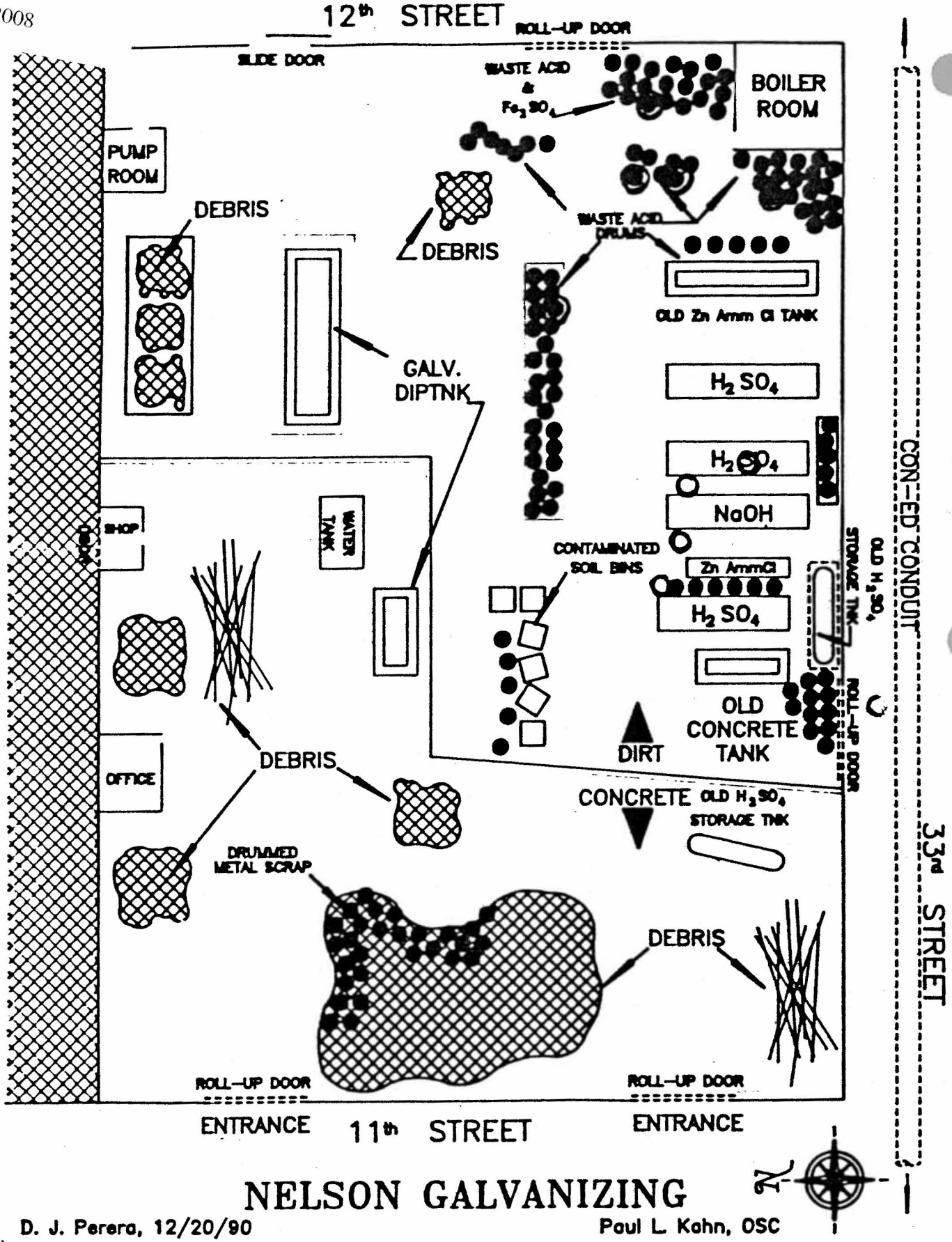
12/13/90 SAMPLING

O - SALT SAMPLE

O - SEDIMENT SAMPLE

DIAGRAM #2

NGI 2.2008



NELSON GALVANIZING

D. J. Perera, 12/20/90

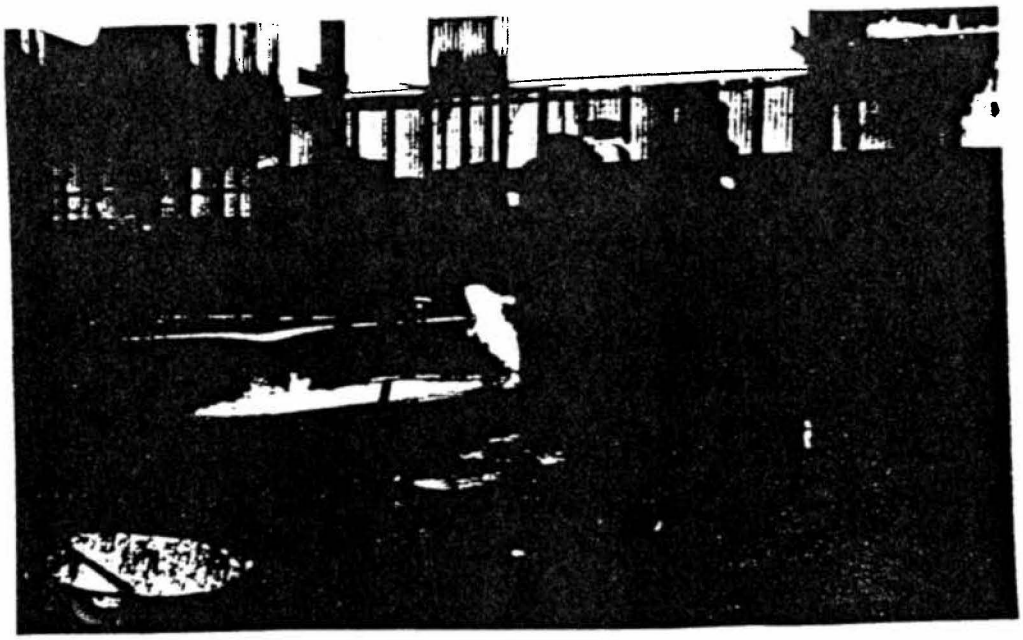
Paul L. Kahn, OSC

- GROUNDWATER WELL
- SALT SAMPLES
- ACID SAMPLES
- SOIL SAMPLES

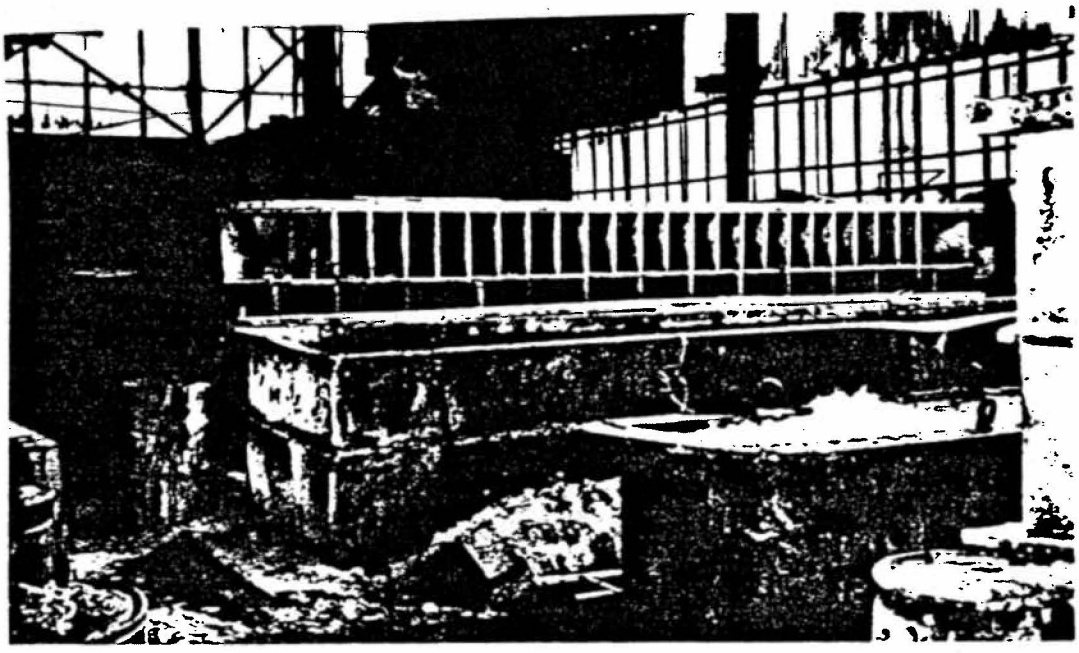
1/16/91 SAMPLING

Photo #1: Nelson Galvanizing, World Headquarters.

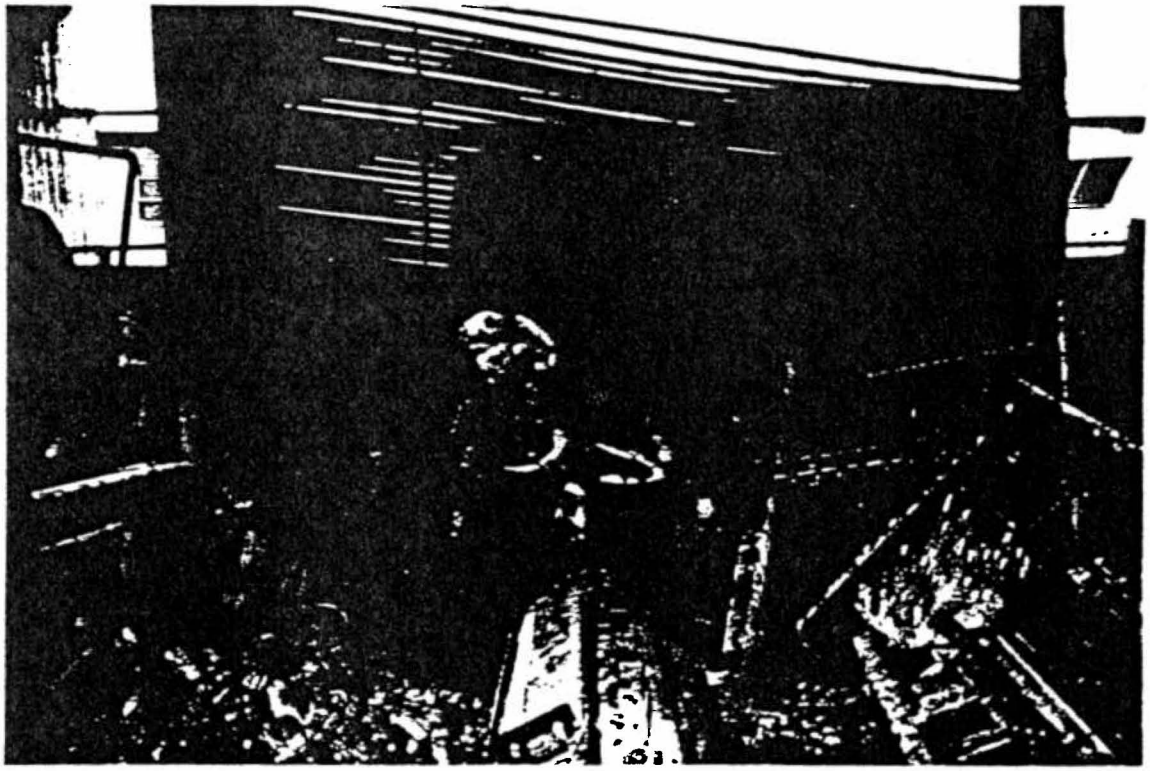
Photo #2: Drums stacked up on top of each other as much as five drums high.

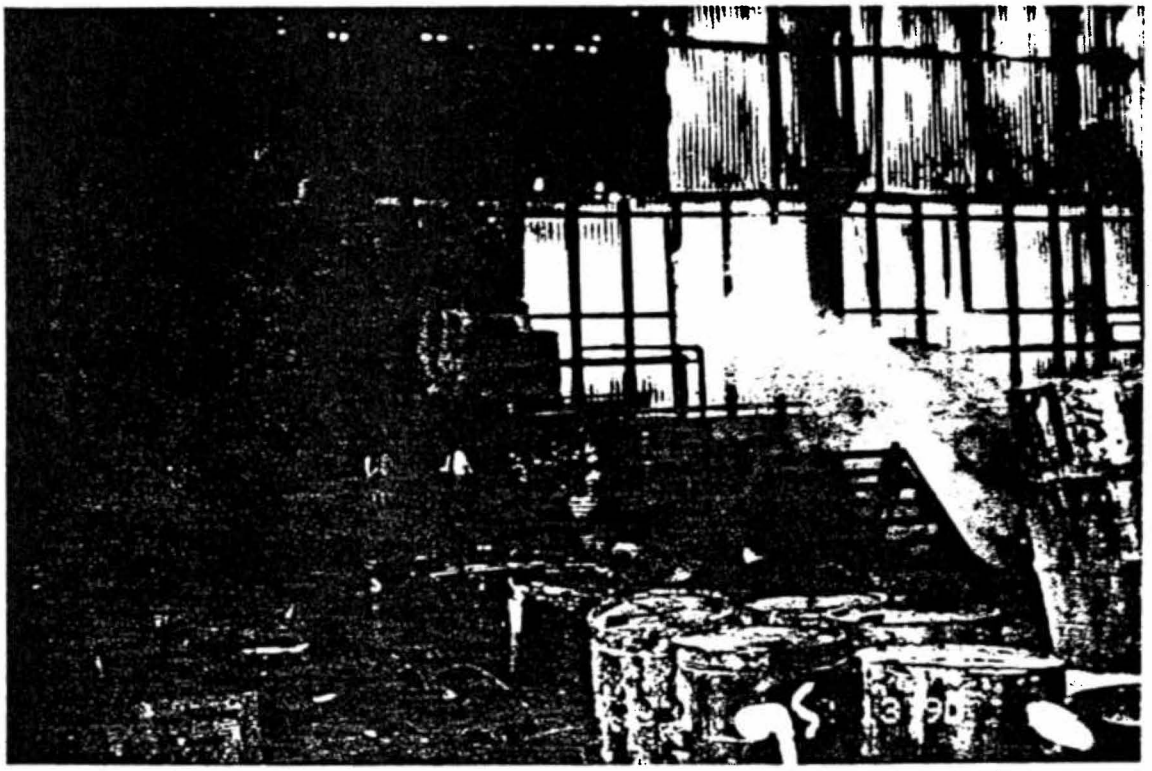


3. Sulfuric acid bath tank #1. The liquid that is steaming is Zinc ammonium chloride (pre-flux solution to prevent oxidation).

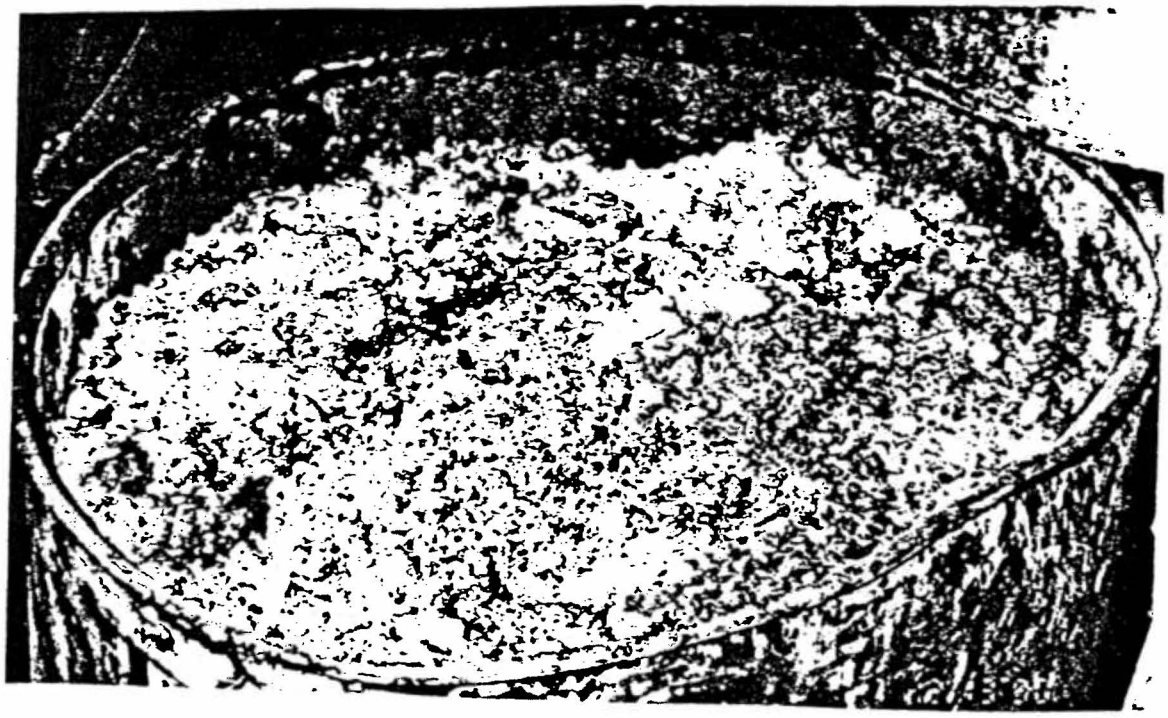


4. Large tank in background is Sulfuric acid bath tank #2. In front of it is the Sodium hydroxide tank, a caustic used to treat material that has paint, and oil & grease from its surface.

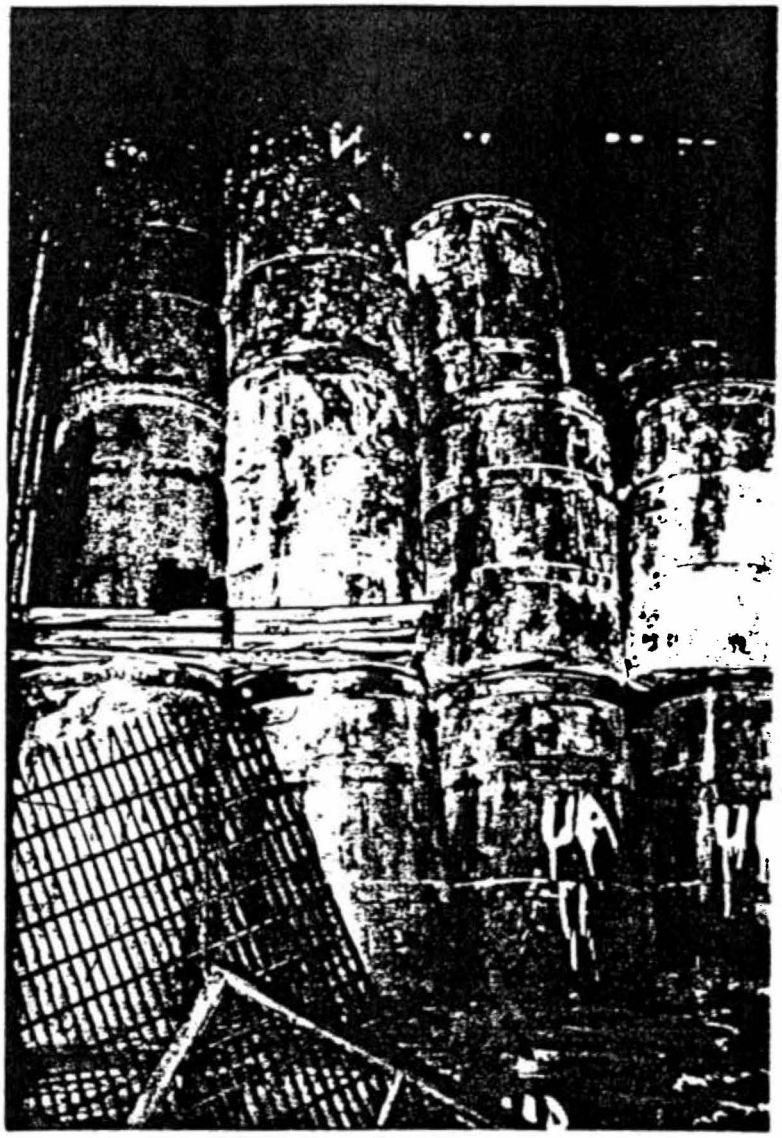




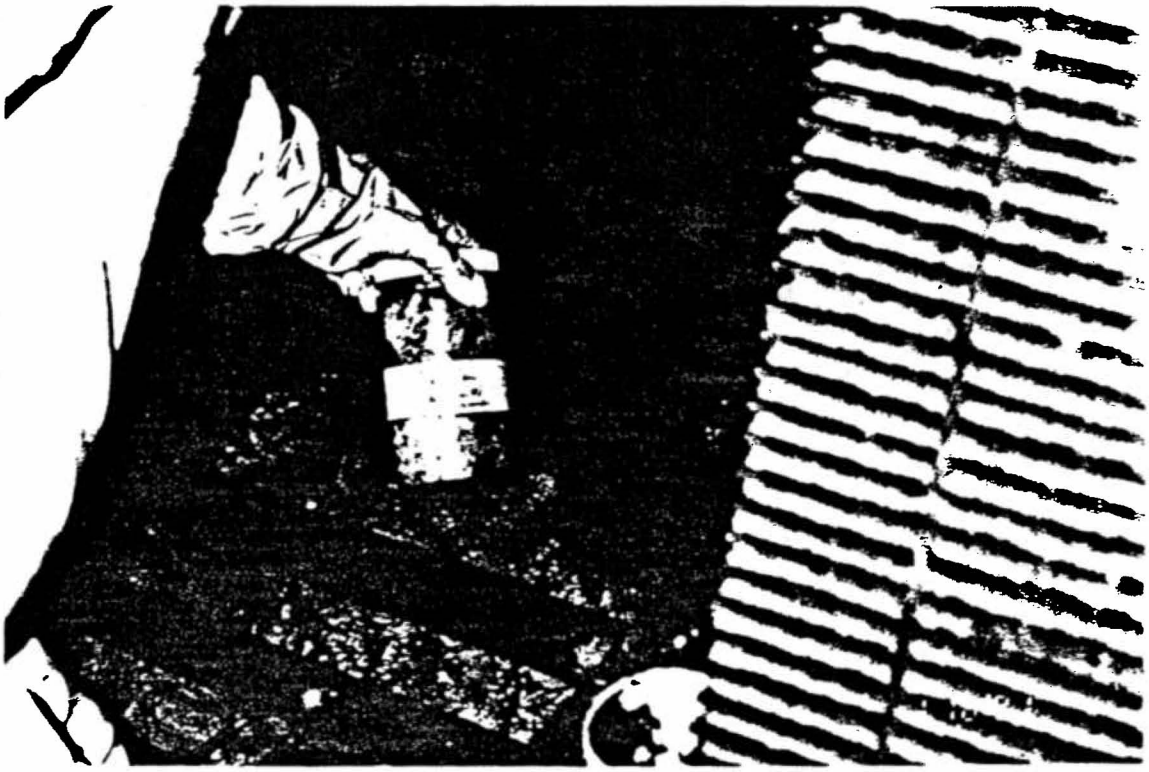
5. & 6. Examples of the facilities' practice of drum storage throughout the building.



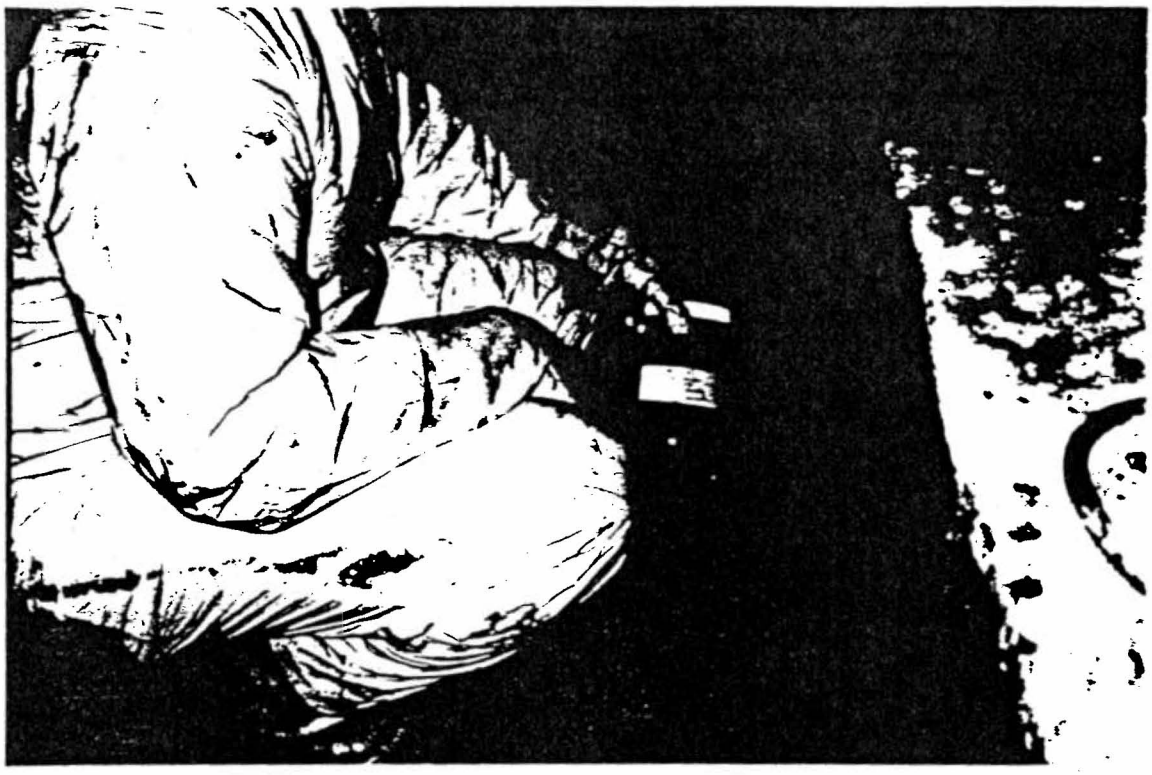
7. & 8. Two of the drums sampled containing iron sulfate salts.



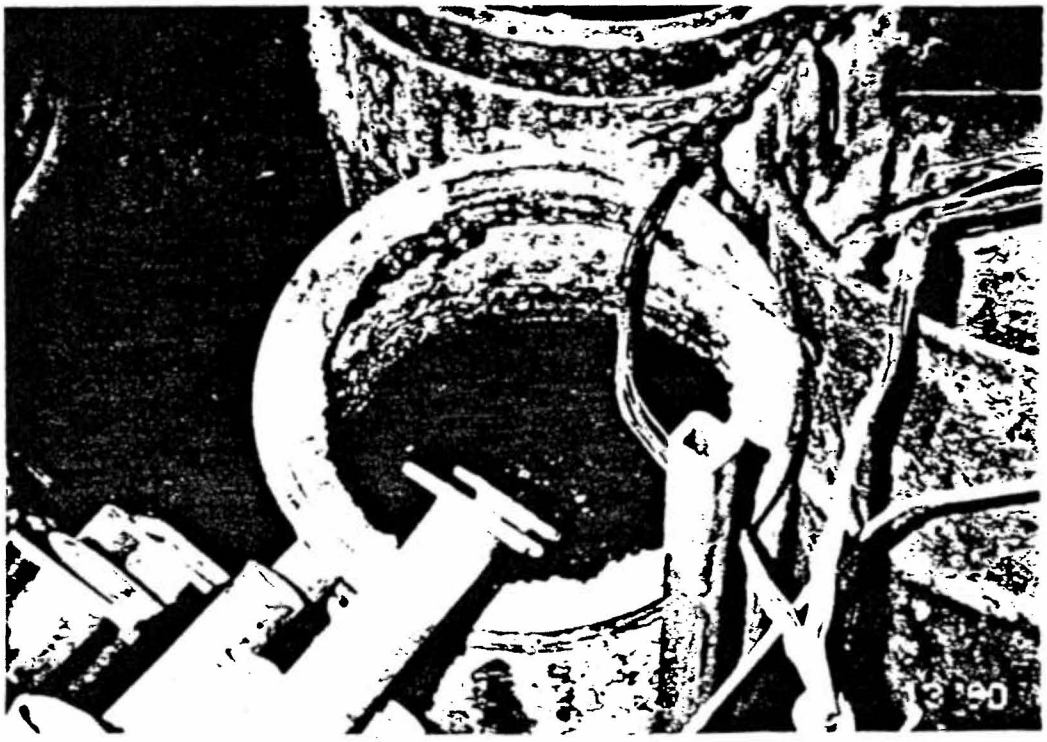
9. Drums with "UA" denote used acids, while others in this pile contained iron sulfate salts.



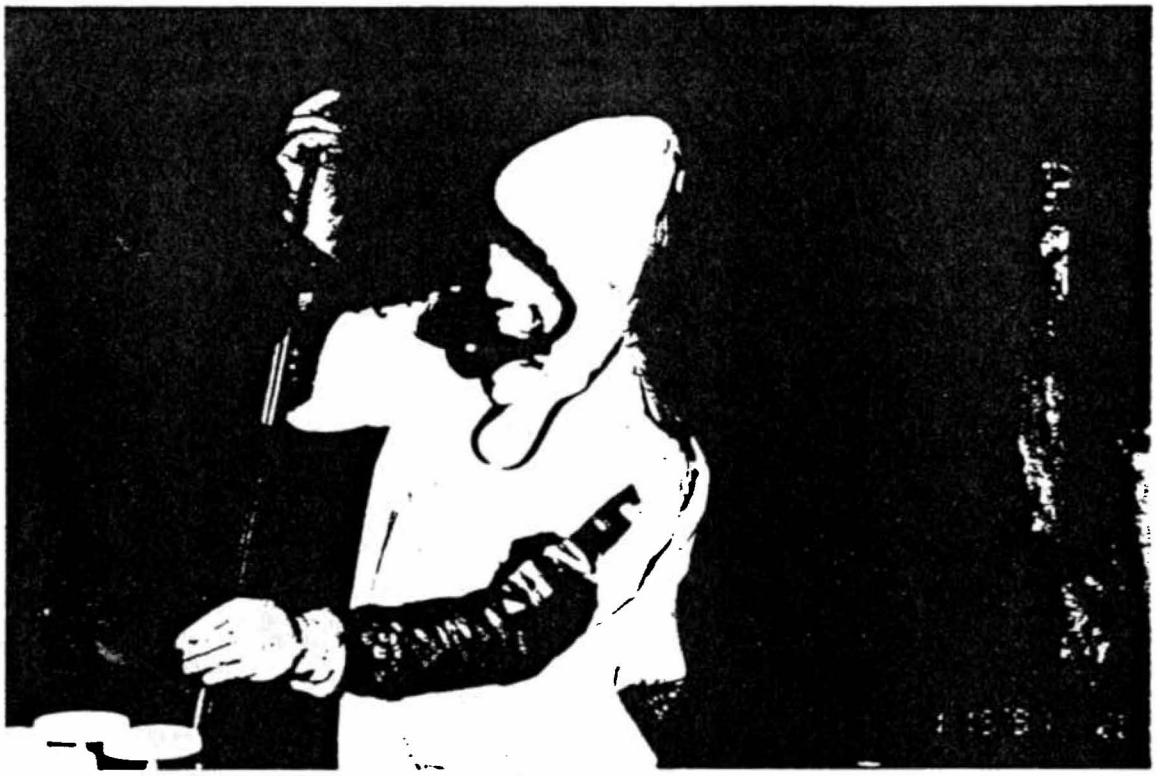
10. & 11. Spill Areas #1 and #2, located near Sulfuric acid tanks.

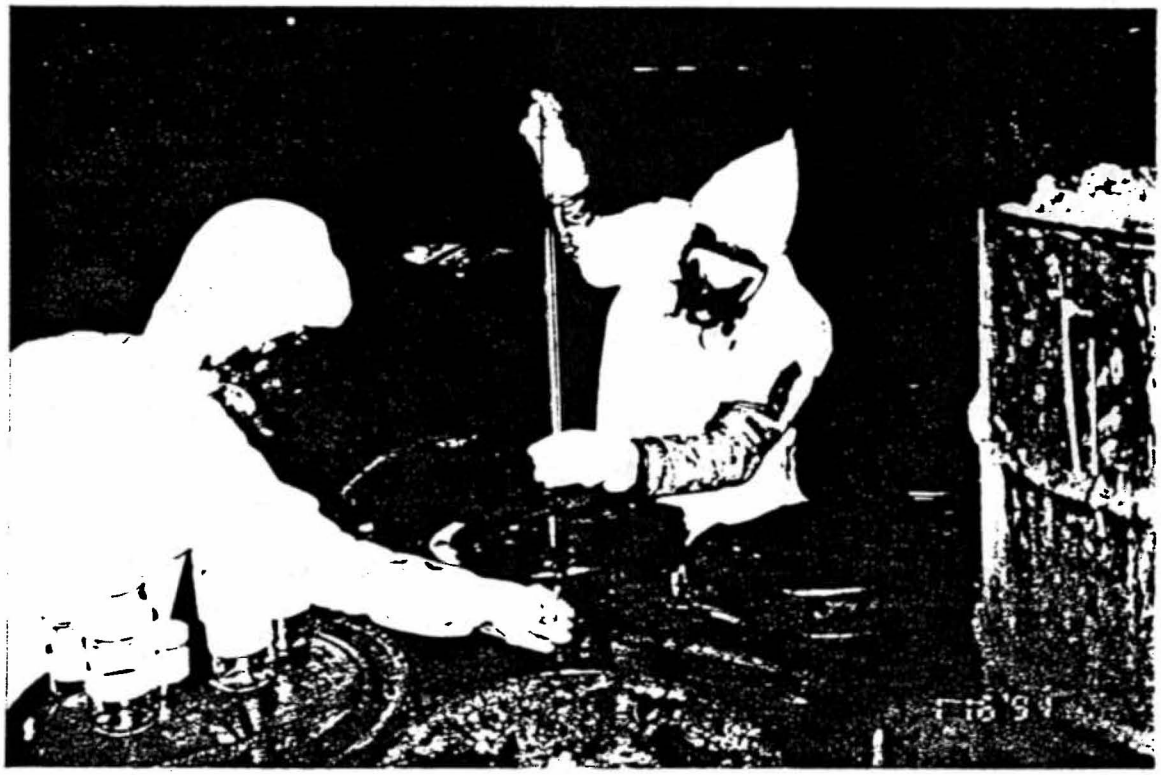


12. Spill Area #3n located next to the Zinc ammonium chloride tank.

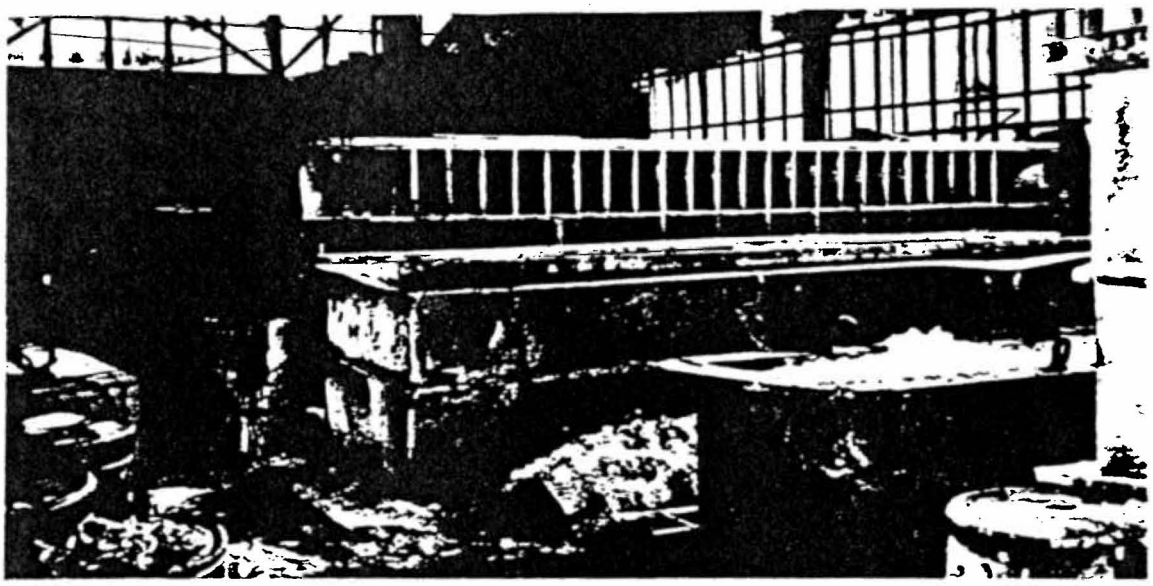


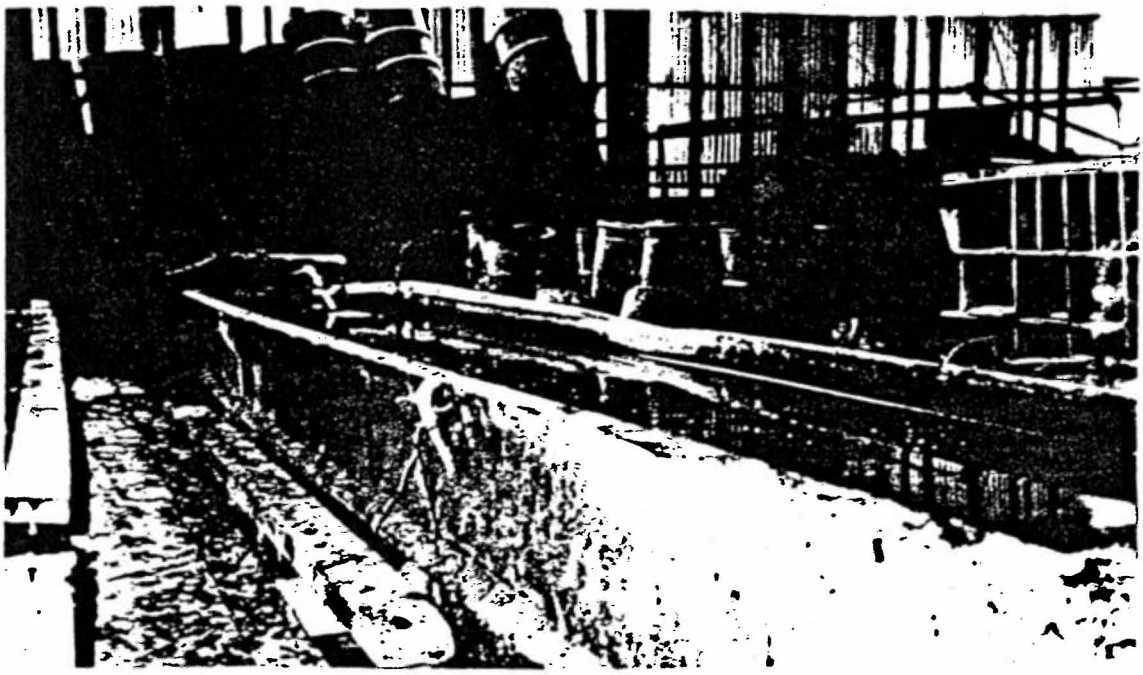
13. A drum of acid, with iron sulfate salts precipitating out of the solution.





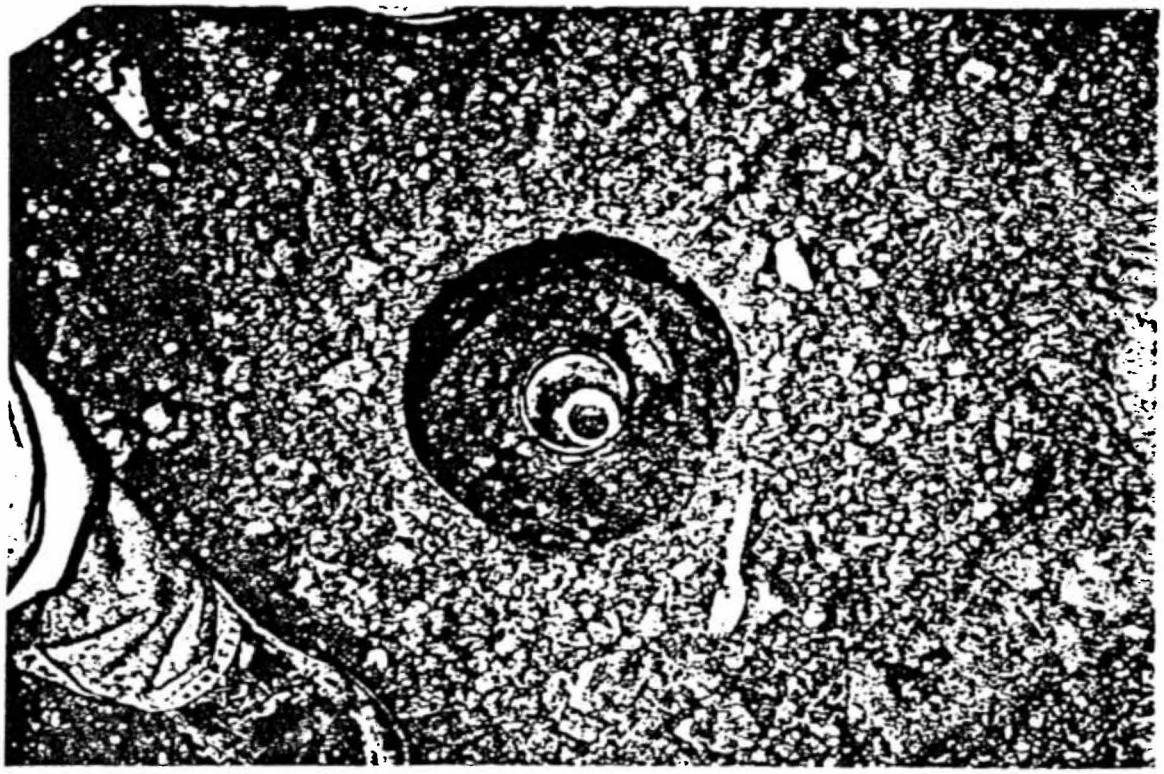
14. & 15. Drum sampling.



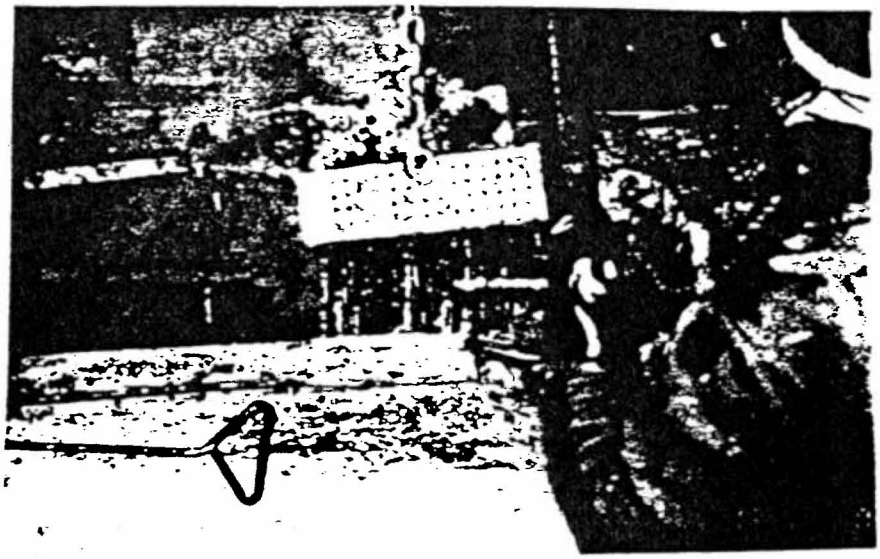


16. & 17. Sodium hydroxide bath tank.

18. Condition of the floor around the acid tanks.

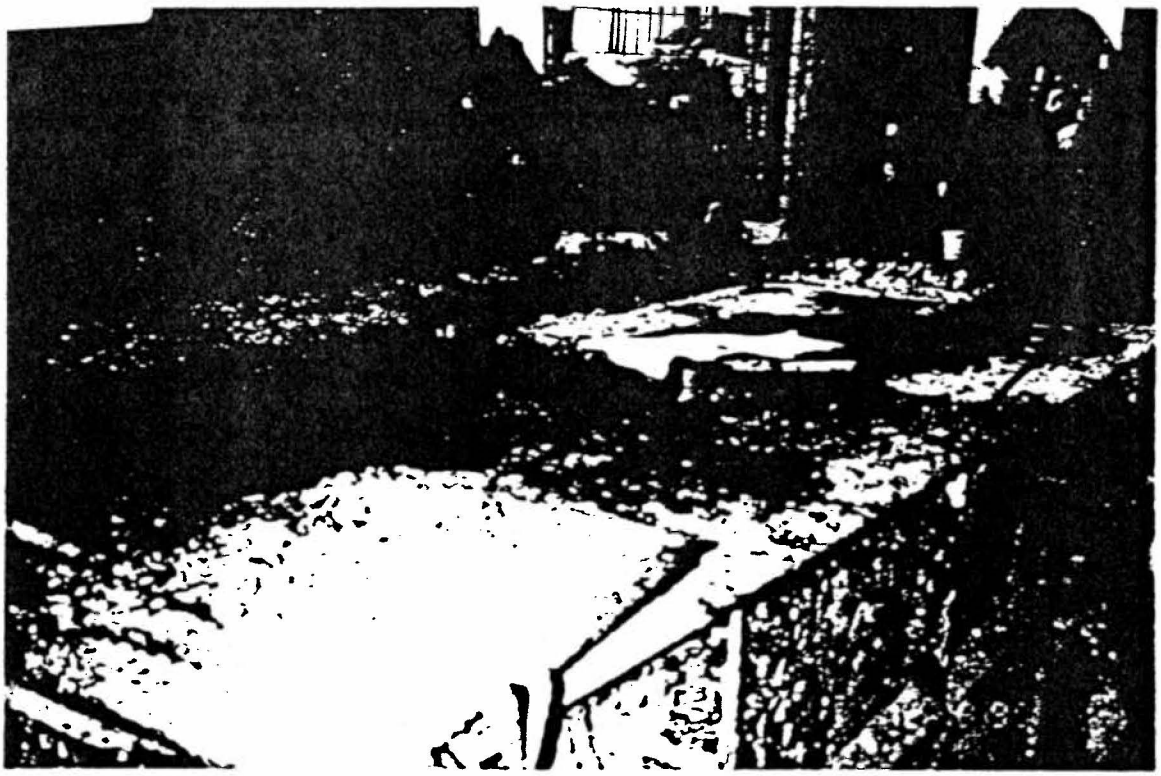


19. Monitoring well located on the southside of the building.



20. "Dross" taken from the bottom of the molten zinc tank.

21. "Dross" taken out of molds and cooled to eventually sell to a broker.



22. One of two active molten zinc tanks.

23. The final product, galvanized steel.

REPORT DATE: 91/02/05

COMPLETED ANALYSIS REPORT

PROJECT NO: 972

PROJECT NAME: NELSON GALVANIZING

EXPLANATIONS OF REMARK CODES

REMARK CODE	EXPLANATION
B	RESULTS BASED UPON COLONY COUNTS OUTSIDE ACCEPTABLE RANGE
J	ESTIMATED VALUE
K	ACTUAL VALUE KNOWN TO BE LESS THAN VALUE GIVEN
L	ACTUAL VALUE KNOWN TO BE GREATER THAN VALUE GIVEN
M	PRESENCE OF MATERIAL VERIFIED BUT NOT QUANTIFIED
N	NO OBSERVABLE EFFECT CONCENTRATION < 0.3%
O	SAMPLED BUT NOT ANALYZED DUE TO LAB ACCIDENT
T	REPORTED VALUE LESS THAN CRITERIA OF DETECTION
U	MATERIAL ANALYZED FOR, BUT NOT DETECTED

QA/QC REMARK CODES

CODE	EXPLANATION
QD	ACCURACY CHECK SAMPLE ABOVE UPPER ACCEPTANCE LIMIT
QE	ACCURACY CHECK SAMPLE BELOW LOWER ACCEPTANCE LIMIT
QF	PRECISION OF CALIBRATION CURVE LESS THAN ACCEPTANCE CRITERIA
QG	CONTINUING CALIBRATION CHECK DOES NOT MEET ACCEPTANCE CRITERIA
QS	SPIKE RECOVERIES ABOVE UPPER ACCPETANCE LIMIT
QR	SPIKE RECOVERIES BELOW LOWER ACCPETANCE LIMIT
QP	SAMPLE REPLICATE PRECISION DOES NOT MEET ACCEPTANCE CRITERIA
QH	RECOMMENDED HOLDING TIMES EXCEEDED
QT	TENTATIVELY IDENTIFIED COMPOUND
QB	BLANK CONTAMINATED BY ANALYTE IN EXCESS OF ACCEPTANCE CRITERIA
QQ	SAMPLE IMPROPERLY PRESERVED

LOCATION CODES FOR IDENTIFICATION OF SAMPLING POINTS AT INDUSTRIAL / SANITARY FACILITIES, LANDFILLS, HAZARDOUS WASTE SITES.

CODE NUMBERS	SAMPLING POINTS
1001 - 1050	EFFLUENT PIPE NUMBER 001 TO 050
1051 - 1099	OTHER EFFLUENTS SUCH AS COOLING TOWER DISCHARGE, DISCHARGE FROM HOLDING PONDS, ETC...
1100 - 1249	IN PLANT SAMPLES
1435 - 1454	SEPARATE INFLUENT POINTS/WATER SOURCES
15XX	INFLUENT ASSOCIATED WITH EFFLUENT 10XX
2000	BLANK FOR VOLATILE ORGANICS
3000 - 3099	GROUND WATER FROM WELL 01 TO 99
3100 - 3199	SEDIMENT SAMPLE (WATER BOTTOM)
3200 - 3299	SOIL SAMPLE
3300 - 3399	STREAM WATER SAMPLE
3400 - 3499	LAGOON SAMPLE
3500 - 3599	STORAGE TANK SAMPLE
3600 - 3699	LEACHATE SAMPLE
3700 - 3799	OTHER TYPE SAMPLE

ATTACHMENT #1

NGI 2.2021

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/02/05

PROJECT NO: 972

PROJECT NAME: NELSON GALVANIZING

STATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
0000	90/12/13	1400							
DEPTH: 0000 SUBSTRATE: ACID									
DESCRIPTION: ELEKTROMEK DRUM									
			094701	99920	CORROSIVITY	PH	TOTAL	1.0	
0000	90/12/13	1406							
DEPTH: 0000 SUBSTRATE: ACID									
DESCRIPTION: OPEN DRUM NEXT TO H2SO4 TANK									
			094702	99920	CORROSIVITY	PH	TOTAL	1.7	
0000	90/12/13	1412							
DEPTH: 0000 SUBSTRATE: ACID									
DESCRIPTION: OPEN DRUM NEXT TO H2SO4 TANK									
			094703	99920	CORROSIVITY	PH	TOTAL	2.1	
0000	90/12/13	1428							
DEPTH: 0000 SUBSTRATE: ACID									
DESCRIPTION: STANDING LIQUID BENEATH A DRUM NEAR REAR DOOR									
			094704	99920	CORROSIVITY	PH	TOTAL	2.2	
0000	90/12/13	1503							
DEPTH: 0000 SUBSTRATE: SALT									
DESCRIPTION: DRUM HOLDING IRON SULFATE SALTS									
			094705	99903	CADMIUM	MG/L	TOTAL	0.1	U
				99904	CHROMIUM	MG/L	TOTAL	1	U
				99999	COPPER	MG/L	TOTAL	2.5	U
				99906	LEAD	MG/L	TOTAL	2	U
				99918	ZINC	MG/L	TOTAL	240	
0000	90/12/13	1505							
DEPTH: 0000 SUBSTRATE: SEDIMENT									
DESCRIPTION: FROM BINS NEAR SMALL ZINC BATH									
			094706	99903	CADMIUM	MG/L	TOTAL	0.538	
				99904	CHROMIUM	MG/L	TOTAL	0.026	
				99999	COPPER	MG/L	TOTAL	0.025	U
				99906	LEAD	MG/L	TOTAL	0.667	
				99918	ZINC	MG/L	TOTAL	5680	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/02/05

PROJECT NO: 972

PROJECT NAME: NELSON GALVANIZING

STATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
0000	90/12/14	0720							
DEPTH: 0000 SUBSTRATE: AQUEOUS									
DESCRIPTION: EQUIPMENT BLANK OF SCOOP									
			094707	99903	CADMIUM	MG/L	TOTAL	0.005 U	
				99904	CHROMIUM	MG/L	TOTAL	0.010 U	
				99999	COPPER	MG/L	TOTAL	0.025 U	
				99906	LEAD	MG/L	TOTAL	0.020 U	
				99918	ZINC	MG/L	TOTAL	0.020 U	

***** END OF PROJECT *****

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

EXPLANATIONS OF REMARK CODES

REMARK CODE	EXPLANATION
B	RESULTS BASED UPON COLONY COUNTS OUTSIDE ACCEPTABLE RANGE
J	ESTIMATED VALUE
K	ACTUAL VALUE KNOWN TO BE LESS THAN VALUE GIVEN
L	ACTUAL VALUE KNOWN TO BE GREATER THAN VALUE GIVEN
M	PRESENCE OF MATERIAL VERIFIED BUT NOT QUANTIFIED
N	NO OBSERVABLE EFFECT CONCENTRATION < 0.3%
O	SAMPLED BUT NOT ANALYZED DUE TO LAB ACCIDENT
T	REPORTED VALUE LESS THAN CRITERIA OF DETECTION
U	REPORTING LIMIT

QA/QC REMARK CODES

CODE	EXPLANATION
OD	ACCURACY CHECK SAMPLE ABOVE UPPER ACCEPTANCE LIMIT
OE	ACCURACY CHECK SAMPLE BELOW LOWER ACCEPTANCE LIMIT
OF	PRECISION OF CALIBRATION CURVE LESS THAN ACCEPTANCE CRITERIA
OG	CONTINUING CALIBRATION CHECK DOES NOT MEET ACCEPTANCE CRITERIA
OS	SPIKE RECOVERIES ABOVE UPPER ACCPETANCE LIMIT
OR	SPIKE RECOVERIES BELOW LOWER ACCPETANCE LIMIT
OP	SAMPLE REPLICATE PRECISION DOES NOT MEET ACCEPTANCE CRITERIA
OH	RECOMMENDED HOLDING TIMES EXCEEDED
OT	TENTATIVELY IDENTIFIED COMPOUND
OB	BLANK CONTAMINATED BY ANALYTE IN EXCESS OF ACCEPTANCE CRITERIA
OQ	SAMPLE IMPROPERLY PRESERVED

LOCATION CODES FOR IDENTIFICATION OF SAMPLING POINTS AT INDUSTRIAL / SANITARY FACILITIES, LANDFILLS, HAZARDOUS WASTE SITES.

CODE NUMBERS	SAMPLING POINTS
1001 - 1050	EFFLUENT PIPE NUMBER 001 TO 050
1051 - 1099	OTHER EFFLUENTS SUCH AS COOLING TOWER DISCHARGE, DISCHARGE FROM HOLDING PONDS, ETC...
1100 - 1249	IN PLANT SAMPLES
1435 - 1454	SEPARATE INFLUENT POINTS/WATER SOURCES
15XX	INFLUENT ASSOCIATED WITH EFFLUENT 10XX
2000	BLANK FOR VOLATILE ORGANICS
3000 - 3099	GROUND WATER FROM WELL 01 TO 99
3100 - 3199	SEDIMENT SAMPLE (WATER BOTTOM)
3200 - 3299	SOIL SAMPLE
3300 - 3399	STREAM WATER SAMPLE
3400 - 3499	LAGOON SAMPLE
3500 - 3599	STORAGE TANK SAMPLE
3600 - 3699	LEACHATE SAMPLE
3700 - 3799	OTHER TYPE SAMPLE

ATTACHMENT #2

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

STATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
INE	91/01/16	1642							
PTH: 0000	SUBSTRATE: AQUEOUS								
SCRIPTION:	GROUNDWATER WELL #1								
			099576	34418	METHYL CHLORIDE	UG/L	TOTAL	500 U	
				34413	METHYL BROMIDE	UG/L	TOTAL	500 U	
				39175	VINYL CHLORIDE	UG/L	TOTAL	500 U	
				34311	CHLOROETHANE	UG/L	TOTAL	500 U	
				34423	METHYLENE CHLORIDE	UG/L	TOTAL	500 U	
				99930	ACETONE	UG/L	TOTAL	500 U	
				99964	CARBON DISULFIDE	UG/L	TOTAL	500 U	
				34501	1,1-DICHLOROETHYLENE	UG/L	TOTAL	500 U	
				34496	1,1-DICHLOROETHANE	UG/L	TOTAL	500 U	
				34546	1,2-TRANS DICHLOROETHYLENE	UG/L	TOTAL	500 U	
				32106	CHLOROFORM	UG/L	TOTAL	500 U	
				32103	1,2-DICHLOROETHANE	UG/L	TOTAL	500 U	
				99999	2-BUTANONE	UG/L	TOTAL	500 U	
				34506	1,1,1-TRICHLOROETHANE	UG/L	TOTAL	500 U	
				32102	CARBON TETRACHLORIDE	UG/L	TOTAL	500 U	
				99999	VINYL ACETATE	UG/L	TOTAL	500 U	
				32101	DICHLOROBROMOMETHANE	UG/L	TOTAL	500 U	
				34541	1,2-DICHLOROPROPANE	UG/L	TOTAL	500 U	
				34561	1,3-DICHLOROPROPYLENE	UG/L	TOTAL	500 U	
				39180	TRICHLOROETHYLENE	UG/L	TOTAL	20 M	
				32105	CHLORODIBROMOMETHANE	UG/L	TOTAL	500 U	
				34511	1,1,2-TRICHLOROETHANE	UG/L	TOTAL	500 U	
				34030	BENZENE	UG/L	TOTAL	500 U	
				99999	CIS-1,3-DICHLOROPROPENE	UG/L	TOTAL	500 U	
				32104	BROMOFORM	UG/L	TOTAL	500 U	
				99999	4-METHYL-2-PENTANONE	UG/L	TOTAL	500 U	
				34475	TETRACHLOROETHYLENE	UG/L	TOTAL	30 M	
				34516	1,1,2,2-TETRACHLOROETHANE	UG/L	TOTAL	500 U	
				99999	2-HEXANONE	UG/L	TOTAL	500 U	
				34010	TOLUENE	UG/L	TOTAL	500 U	
				34301	CHLOROBENZENE	UG/L	TOTAL	32 M	
				34371	ETHYLBENZENE	UG/L	TOTAL	500 U	
				99921	STYRENE	UG/L	TOTAL	500 U	
				99920	XYLENES (TOTAL)	UG/L	TOTAL	500 U	
				34586	2-CHLOROPHENOL	UG/L	TOTAL	10 U	
				34591	2-NITROPHENOL	UG/L	TOTAL	10 U	
				34694	PHENOL	UG/L	TOTAL	2.1	
				34606	2,4-DIMETHYLPHENOL	UG/L	TOTAL	10 U	
				34601	2,4-DICHLOROPHENOL	UG/L	TOTAL	10 U	
				34621	2,4,6-TRICHLOROPHENOL	UG/L	TOTAL	10 U	
				34452	P-CHLORO-M-CRESOL	UG/L	TOTAL	10 U	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099576	34616	2,4-DINITROPHENOL	UG/L	TOTAL	50 U	
				34657	4,6-DINITRO-O-CRESOL	UG/L	TOTAL	50 U	
				39032	PENTACHLOROPHENOL	UG/L	TOTAL	50 U	
				34646	4-NITROPHENOL	UG/L	TOTAL	50 U	
				34566	1,3-DICHLOROBENZENE	UG/L	TOTAL	10 U	
				34571	1,4-DICHLOROBENZENE	UG/L	TOTAL	10 U	
				34536	1,2-DICHLOROBENZENE	UG/L	TOTAL	10 U	
				34396	HEXACHLOROETHANE	UG/L	TOTAL	10 U	
				39702	HEXACHLOROBUTADIENE	UG/L	TOTAL	10 U	
				34551	1,2,4-TRICHLOROBENZENE	UG/L	TOTAL	10 U	
				34696	NAPHTHALENE	UG/L	TOTAL	10 U	
				34273	BIS(2-CHLOROETHYL) ET.	UG/L	TOTAL	10 U	
				34278	BIS(2-CHLOROETHOXY) METH.	UG/L	TOTAL	10 U	
				34408	ISOPHORONE	UG/L	TOTAL	10 U	
				34447	NITROBENZENE	UG/L	TOTAL	10 U	
				34428	N-NITROSODI-N-PROPYLAMINE	UG/L	TOTAL	10 U	
				34433	N-NITROSODIPHENYLAMINE	UG/L	TOTAL	10 U	
				34283	BIS(2-CHLOROISOPROPYL) ET.	UG/L	TOTAL	10 U	
				34386	HEXACHLOROCYCLOPENTADIENE	UG/L	TOTAL	10 U	
				34581	2-CHLORONAPHTHALENE	UG/L	TOTAL	10 U	
				34200	ACENAPHTHYLENE	UG/L	TOTAL	0.5	
				34205	ACENAPHTHENE	UG/L	TOTAL	1.3	
				34381	FLUORENE	UG/L	TOTAL	10 U	
				39700	HEXACHLOROBENZENE	UG/L	TOTAL	10 U	
				34636	4-BROMOPHENYL PHENYL ET.	UG/L	TOTAL	10 U	
				34461	PHENANTHRENE	UG/L	TOTAL	5.3	
				34220	ANTHRACENE	UG/L	TOTAL	1.1	
				34341	DIMETHYL PHTHALATE	UG/L	TOTAL	10 U	
				34336	DIETHYL PHTHALATE	UG/L	TOTAL	10 U	
				39110	DI-N-BUTYLPPHTHALATE	UG/L	TOTAL	10 U	
				34292	BUTYL BENZYL PHTHALATE	UG/L	TOTAL	10 U	
				34596	DI-N-OCTYL PHTHALATE	UG/L	TOTAL	10 U	
				39100	BIS(2-ETHYLHEXYL) PHTHAL.	UG/L	TOTAL	29 J	OG
				34376	FLUORANTHENE	UG/L	TOTAL	5.1	
				34469	PYRENE	UG/L	TOTAL	4.7	
				34320	CHRYSENE	UG/L	TOTAL	2.6	
				34526	1,2-BENZANTHRACENE	UG/L	TOTAL	2.3	
				34641	4-CHLOROPHENYL PHENYL ET.	UG/L	TOTAL	10 U	
				34403	INDENO(1,2,3-C,D) PYRENE	UG/L	TOTAL	1.1	
				34247	BENZO(A)PYRENE	UG/L	TOTAL	1.9	
				34521	1,12-BENZOPERYLENE	UG/L	TOTAL	1.2	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

ATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099576	34556	1,2:5,6-DIBENZANTHRACENE	UG/L	TOTAL	10 U	
				34631	3,3'-DICHLOROBENZIDENE	UG/L	TOTAL	10 U	
				34626	2,6-DINITROTOLUENE	UG/L	TOTAL	10 U	
				34611	2,4-DINITROTOLUENE	UG/L	TOTAL	10 U	
				34346	1,2-DIPHENYLHYDRAZINE	UG/L	TOTAL	10 U	
				34230	3,4-BENZOFLUORANTHENE	UG/L	TOTAL	2.2	
				34242	11,12-BENZOFLUORANTHENE	UG/L	TOTAL	1.6 J	OG
				99999	BENZYL ALCOHOL	UG/L	TOTAL	10 U	
				99999	2-METHYL PHENOL	UG/L	TOTAL	2.6	
				99999	4-METHYL PHENOL	UG/L	TOTAL	10 U	
				99999	BENZOIC ACID	UG/L	TOTAL	5.1	
				99999	4-CHLOROANILINE	UG/L	TOTAL	50 U	
				99999	2-METHYL NAPHTHALENE	UG/L	TOTAL	10 U	
				88894	2,4,5-TRICHLOROPHENOL	UG/L	TOTAL	50 U	
				99999	ANILINE	UG/L	TOTAL	10 U	
				99999	2-NITROANILINE	UG/L	TOTAL	50 U	
				99999	3-NITROANILINE	UG/L	TOTAL	50 U	
				99999	DIBENZOFURAN	UG/L	TOTAL	1.0 J	OG
				99999	4-NITROANILINE	UG/L	TOTAL	50 U	
				01077	SILVER	UG/L	TOTAL	1000 U	
				01105	ALUMINUM	UG/L	TOTAL	1670600 J	QS
				01002	ARSENIC	UG/L	TOTAL	100 U	OR
				01007	BARIUM	UG/L	TOTAL	20000 U	
				01012	BERYLLIUM	UG/L	TOTAL	500 U	
				00916	CALCIUM	MG/L	TOTAL	500 U	
				01027	CADMIUM	UG/L	TOTAL	1000 U	
				01037	COBALT	UG/L	TOTAL	5000 U	
				01034	CHROMIUM	UG/L	TOTAL	1000 U	OR
				01042	COPPER	UG/L	TOTAL	2500 U	
				01045	IRON	UG/L	TOTAL	35000000 J	
				71900	MERCURY	UG/L	TOTAL	0.2 U	
				00937	POTASSIUM	MG/L	TOTAL	500 U	
				00927	MAGNESIUM	MG/L	TOTAL	1790	
				01055	MANGANESE	UG/L	TOTAL	366100	
				00929	SODIUM	MG/L	TOTAL	500 U	
				01067	NICKEL	UG/L	TOTAL	14540	
				01051	LEAD	UG/L	TOTAL	2290	
				01097	ANTIMONY	UG/L	TOTAL	6000 U	OR
				01147	SELENIUM	UG/L	TOTAL	50 U	OR
				01059	THALLIUM	UG/L	TOTAL	100 U	OR
				01087	VANADIUM	UG/L	TOTAL	5000 U	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
	91/01/16	1644	099576	01092	ZINC	UG/L	TOTAL	5890000	
H: 0000 SUBSTRATE: AQUEOUS									
RIPTION: GROUNDWATER WELL #1									
			099577	34418	METHYL CHLORIDE	UG/L	TOTAL	500 U	
				34413	METHYL BROMIDE	UG/L	TOTAL	500 U	
				39175	VINYL CHLORIDE	UG/L	TOTAL	500 U	
				34311	CHLOROETHANE	UG/L	TOTAL	500 U	
				34423	METHYLENE CHLORIDE	UG/L	TOTAL	500 U	
				99930	ACETONE	UG/L	TOTAL	500 U	
				99964	CARBON DISULFIDE	UG/L	TOTAL	500 U	
				34501	1,1-DICHLOROETHYLENE	UG/L	TOTAL	500 U	
				34496	1,1-DICHLOROETHANE	UG/L	TOTAL	500 U	
				34546	1,2-TRANS DICHLOROETHYLENE	UG/L	TOTAL	500 U	
				32106	CHLOROFORM	UG/L	TOTAL	500 U	
				32103	1,2-DICHLOROETHANE	UG/L	TOTAL	500 U	
				99999	2-BUTANONE	UG/L	TOTAL	500 U	
				34506	1,1,1-TRICHLOROETHANE	UG/L	TOTAL	500 U	
				32102	CARBON TETRACHLORIDE	UG/L	TOTAL	500 U	
				99999	VINYL ACETATE	UG/L	TOTAL	500 U	
				32101	DICHLOROBROMOMETHANE	UG/L	TOTAL	500 U	
				34541	1,2-DICHLOROPROPANE	UG/L	TOTAL	500 U	
				34561	1,3-DICHLOROPROPYLENE	UG/L	TOTAL	500 U	
				39180	TRICHLOROETHYLENE	UG/L	TOTAL	500 U	
				32105	CHLORODIBROMOMETHANE	UG/L	TOTAL	500 U	
				34511	1,1,2-TRICHLOROETHANE	UG/L	TOTAL	500 U	
				34030	BENZENE	UG/L	TOTAL	500 U	
				99999	CIS-1,3-DICHLOROPROPENE	UG/L	TOTAL	500 U	
				32104	BROMOFORM	UG/L	TOTAL	500 U	
				99999	4-METHYL-2-PENTANONE	UG/L	TOTAL	500 U	
				34475	TETRACHLOROETHYLENE	UG/L	TOTAL	500 U	
				34516	1,1,2,2-TETRACHLOROETHANE	UG/L	TOTAL	500 U	
				99999	2-HEXANONE	UG/L	TOTAL	500 U	
				34010	TOLUENE	UG/L	TOTAL	500 U	
				34301	CHLOROBENZENE	UG/L	TOTAL	500 U	
				34371	ETHYLBENZENE	UG/L	TOTAL	500 U	
				99921	STYRENE	UG/L	TOTAL	500 U	
				99920	XYLENES (TOTAL)	UG/L	TOTAL	500 U	
				01077	SILVER	UG/L	TOTAL	1000 U	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

JECT NO: 979

PROJECT NAME: NELSON GALVANIZING

NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099577	01105	ALUMINUM	UG/L	TOTAL	1605900 J	QS
				01002	ARSENIC	UG/L	TOTAL	100 U	QR
				01007	BARIUM	UG/L	TOTAL	20000 U	
				01012	BERYLLIUM	UG/L	TOTAL	500 U	
				00916	CALCIUM	MG/L	TOTAL	500 U	
				01027	CADMIUM	UG/L	TOTAL	1000 U	
				01037	COBALT	UG/L	TOTAL	5000 U	
				01034	CHROMIUM	UG/L	TOTAL	1000 U	QR
				01042	COPPER	UG/L	TOTAL	2500 U	
				01045	IRON	UG/L	TOTAL	34000000 J	
				71900	MERCURY	UG/L	TOTAL	0.21	
				00937	POTASSIUM	MG/L	TOTAL	500 U	
				00927	MAGNESIUM	MG/L	TOTAL	1790	
				01055	MANGANESE	UG/L	TOTAL	364400	
				00929	SODIUM	MG/L	TOTAL	500 U	
				01067	NICKEL	UG/L	TOTAL	14520	
				01051	LEAD	UG/L	TOTAL	2000 U	
				01097	ANTIMONY	UG/L	TOTAL	6000 U	QR
				01147	SELENIUM	UG/L	TOTAL	50 U	QR
				01059	THALLIUM	UG/L	TOTAL	100 U	QR
				01087	VANADIUM	UG/L	TOTAL	5000 U	
				01092	ZINC	UG/L	TOTAL	5852000	
	91/01/16	1646							
00	SUBSTRATE: AQUEOUS								
ON:	GROUNDWATER WELL #1								
			099578	34418	METHYL CHLORIDE	UG/L	TOTAL	500 U	
				34413	METHYL BROMIDE	UG/L	TOTAL	500 U	
				39175	VINYL CHLORIDE	UG/L	TOTAL	500 U	
				34311	CHLOROETHANE	UG/L	TOTAL	500 U	
				34423	METHYLENE CHLORIDE	UG/L	TOTAL	500 U	
				99930	ACETONE	UG/L	TOTAL	500 U	
				99964	CARBON DISULFIDE	UG/L	TOTAL	500 U	
				34501	1,1-DICHLOROETHYLENE	UG/L	TOTAL	500 U	
				34496	1,1-DICHLOROETHANE	UG/L	TOTAL	500 U	
				34546	1,2-TRANS DICHLOROETHYLENE	UG/L	TOTAL	500 U	
				32106	CHLOROFORM	UG/L	TOTAL	500 U	
				32103	1,2-DICHLOROETHANE	UG/L	TOTAL	500 U	
				99999	2-BUTANONE	UG/L	TOTAL	500 U	
				34506	1,1,1-TRICHLOROETHANE	UG/L	TOTAL	500 U	

NGI 2.2029

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099578	32102	CARBON TETRACHLORIDE	UG/L	TOTAL	500 U	
				99999	VINYL ACETATE	UG/L	TOTAL	500 U	
				32101	DICHLOROBROMOMETHANE	UG/L	TOTAL	500 U	
				34541	1,2-DICHLOROPROPANE	UG/L	TOTAL	500 U	
				34561	1,3-DICHLOROPROPYLENE	UG/L	TOTAL	500 U	
				39180	TRICHLOROETHYLENE	UG/L	TOTAL	500 U	
				32105	CHLORODIBROMOMETHANE	UG/L	TOTAL	500 U	
				34511	1,1,2-TRICHLOROETHANE	UG/L	TOTAL	500 U	
				34030	BENZENE	UG/L	TOTAL	500 U	
				99999	CIS-1,3-DICHLOROPROPENE	UG/L	TOTAL	500 U	
				32104	BROMOFORM	UG/L	TOTAL	500 U	
				99999	4-METHYL-2-PENTANONE	UG/L	TOTAL	500 U	
				34475	TETRACHLOROETHYLENE	UG/L	TOTAL	500 U	
				34516	1,1,2,2-TETRACHLOROETHANE	UG/L	TOTAL	500 U	
				99999	2-HEXANONE	UG/L	TOTAL	500 U	
				34010	TOLUENE	UG/L	TOTAL	500 U	
				34301	CHLOROBENZENE	UG/L	TOTAL	500 U	
				34371	ETHYLBENZENE	UG/L	TOTAL	500 U	
				99921	STYRENE	UG/L	TOTAL	500 U	
				99920	XYLENES (TOTAL)	UG/L	TOTAL	500 U	
				01077	SILVER	UG/L	TOTAL	1000 U	
				01105	ALUMINUM	UG/L	TOTAL	1623200 J	OS
				01002	ARSENIC	UG/L	TOTAL	100 U	QR
				01007	BARIUM	UG/L	TOTAL	20000 U	
				01012	BERYLLIUM	UG/L	TOTAL	500 U	
				00916	CALCIUM	MG/L	TOTAL	500 U	
				01027	CADMIUM	UG/L	TOTAL	1000 U	
				01037	COBALT	UG/L	TOTAL	5000 U	
				01034	CHROMIUM	UG/L	TOTAL	1000 U	QR
				01042	COPPER	UG/L	TOTAL	2500 U	
				01045	IRON	UG/L	TOTAL	35000000 J	
				71900	MERCURY	UG/L	TOTAL	0.32	
				00937	POTASSIUM	MG/L	TOTAL	500 U	
				00927	MAGNESIUM	MG/L	TOTAL	1860	
				01055	MANGANESE	UG/L	TOTAL	375300	
				00929	SODIUM	MG/L	TOTAL	500 U	
				01067	NICKEL	UG/L	TOTAL	15010	
				01051	LEAD	UG/L	TOTAL	3330	
				01097	ANTIMONY	UG/L	TOTAL	6000 U	QR
				01147	SELENIUM	UG/L	TOTAL	50 U	QR
				01059	THALLIUM	UG/L	TOTAL	100 U	QR

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

ATION NO	DATE FROM TO	TIME OF DAY
	91/01/16	1526

TH: 0000 SUBSTRATE: SEDIMENT
CRIPTION: DRUM #3

LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
099578	01087	VANADIUM	UG/L	TOTAL	5000	U
	01092	ZINC	UG/L	TOTAL	6040000	
099579	34421	METHYL CHLORIDE	UG/KG		450	U
	34416	METHYL BROMIDE	UG/KG		450	U
	34495	VINYL CHLORIDE	UG/KG		450	U
	34314	CHLOROETHANE	UG/KG		450	U
	34426	METHYLENE CHLORIDE	UG/KG		450	U
	99930	ACETONE	UG/KG		450	U
	99999	CARBON DISULFIDE	UG/KG		450	U
	34504	1,1-DICHLOROETHYLENE	UG/KG		450	U
	34499	1,1-DICHLOROETHANE	UG/KG		450	U
	34549	1,2-TRANS DICHLOROETHYLENE	UG/KG		450	U
	34318	CHLOROFORM	UG/KG		450	U
	34534	1,2-DICHLOROETHANE	UG/KG		450	U
	99999	2-BUTANONE	UG/KG		450	U
	34509	1,1,1-TRICHLOROETHANE	UG/KG		450	U
	34299	CARBON TETRACHLORIDE	UG/KG		450	U
	99999	VINYL ACETATE	UG/KG		450	U
	34330	DICHLOROBROMOMETHANE	UG/KG		450	U
	34544	1,2-DICHLOROPROPANE	UG/KG		450	U
	34564	1,3-DICHLOROPROPYLENE	UG/KG		450	U
	34487	TRICHLOROETHYLENE	UG/KG		450	U
	34237	BENZENE	UG/KG		450	U
	99999	CIS-1,3-DICHLOROPROPENE	UG/KG		450	U
	34309	CHLORODIBROMOMETHANE	UG/KG		450	U
	34514	1,1,2-TRICHLOROETHANE	UG/KG		450	U
	34290	BROMOFORM	UG/KG		450	U
	34519	1,1,2,2-TETRACHLOROETHANE	UG/KG		450	U
	34478	TETRACHLOROETHYLENE	UG/KG		19	M
	34483	TOLUENE	UG/KG		450	U
	34304	CHLOROBENZENE	UG/KG		450	U
	34374	ETHYLBENZENE	UG/KG		450	U
	99904	STYRENE	UG/KG		450	U
	99999	XYLENES (TOTAL)	UG/KG		450	U
	34589	2-CHLOROPHENOL	UG/KG		10	U
	34594	2-NITROPHENOL	UG/KG		10	U

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

STATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099579	34695	PHENOL	UG/KG		5.2	M
				34609	2,4-DIMETHYLPHENOL	UG/KG		10	U
				34604	2,4-DICHLOROPHENOL	UG/KG		10	U
				34624	2,4,6-TRICHLOROPHENOL	UG/KG		10	U
				99999	P-CHLORO-M-CRESOL	UG/KG		10	U
				34619	2,4-DINITROPHENOL	UG/KG		50	U
				34660	4,6-DINITRO-O-CRESOL	UG/KG		50	U
				99999	PENTACHLOROPHENOL	UG/KG		50	U
				99999	4-NITROPHENOL	UG/KG		50	U
				34569	1,3-DICHLOROBENZENE	UG/KG		10	U
				34574	1,4-DICHLOROBENZENE	UG/KG		10	U
				34539	1,2-DICHLOROBENZENE	UG/KG		10	U
				34399	HEXACHLOROETHANE	UG/KG		10	U
				34394	HEXACHLOROBUTADIENE	UG/KG		10	U
				34554	1,2,4-TRICHLOROBENZENE	UG/KG		10	U
				34445	NAPHTHALENE	UG/KG		10	U
				34276	BIS(2-CHLOROETHYL) ET.	UG/KG		10	U
				34281	BIS(2-CHLOROETHOXY) METH.	UG/KG		10	U
				34411	ISOPHORONE	UG/KG		10	U
				34450	NITROBENZENE	UG/KG		10	U
				34431	N-NITROSODI-N-PROPYLAMINE	UG/KG		10	U
				34436	N-NITROSODIPHENYLAMINE	UG/KG		10	U
				34286	BIS(2-CHLOROISOPROPYL) ETH	UG/KG		10	U
				34389	HEXACHLOROCYCLOPENTADIENE	UG/KG		10	U
				34584	2-CHLORONAPHTHALENE	UG/KG		10	U
				34203	ACENAPHTHYLENE	UG/KG		10	U
				34208	ACENAPHTHENE	UG/KG		10	U
				34384	FLUORENE	UG/KG		10	U
				39701	HEXACHLOROBENZENE	UG/KG		10	U
				34639	4-BROMOPHENYL PHENYL ET.	UG/KG		10	U
				34464	PHENANTHRENE	UG/KG		32	
				34223	ANTHRACENE	UG/KG		2.0	M
				34344	DIMETHYL PHTHALATE	UG/KG		10	U
				34339	DIETHYL PHTHALATE	UG/KG		10	U
				39112	DI-N-BUTYLPPHTHALATE	UG/KG		10	U
				34295	BUTYL BENZYL PHTHALATE	UG/KG		69	
				34599	DI-N-OCTYL PHTHALATE	UG/KG		10	U
				39102	BIS(2-ETHYLHEXYL) PHTHAL.	UG/KG		300	
				34379	FLUORANTHENE	UG/KG		10	U
				34472	PYRENE	UG/KG		10	
				34323	CHRYSENE	UG/KG		2.6	M

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099579	34529	1,2-BENZANTHRACENE	UG/KG		10 U	
				34644	4-CHLOROPHENYL PHENYL ET.	UG/KG		10 U	
				34406	INDENO(1,2,3-C,D) PYRENE	UG/KG		10 U	
				34250	BENZO(A)PYRENE	UG/KG		10 U	
				34524	1,12-BENZOPERYLENE	UG/KG		10 U	
				34559	1,2:5,6-DIBENZANTHRACENE	UG/KG		10 U	
				34634	3,3'-DICHLOROBENZIDENE	UG/KG		10 U	
				34629	2,6-DINITROTOLUENE	UG/KG		10 U	
				34614	2,4-DINITROTOLUENE	UG/KG		10 U	
				34349	1,2-DIPHENYLHYDRAZINE	UG/KG		10 U	
				34233	3,4-BENZOFLUORANTHENE	UG/KG		10 U	
				34245	11,12-BENZOFLUORANTHENE	UG/KG		10 U	
				99999	BENZYL ALCOHOL	UG/KG		10 U	
				99999	2-METHYL PHENOL	UG/KG		10 U	
				99999	4-METHYL PHENOL	UG/KG		10 U	
				99999	BENZOIC ACID	UG/KG		10 U	
				77722	4-CHLOROANILINE	UG/KG		10 U	
				99999	ANILINE	UG/KG		10 U	
				99999	2-METHYL NAPHTHALENE	UG/KG		18	
				77733	2,4,5-TRICHLOROPHENOL	UG/KG		50 U	
				99999	2-NITROANILINE	UG/KG		50 U	
				99999	3-NITROANILINE	UG/KG		50 U	
				99999	DIBENZOFURAN	UG/KG		2.8 M	
				99999	4-NITROANILINE	UG/KG		50 U	
				01078	SILVER	MG/KG		5 U	
				01003	ARSENIC	MG/KG		1.0 U	
				01008	BARIUM	MG/KG		100 U	
				01028	CADMIUM	MG/KG		5 U	
				01029	CHROMIUM	MG/KG		5 U	
				71921	MERCURY	MG/KG		0.04 U	
				01052	LEAD	MG/KG		26	
	91/01/16	1520		01148	SELENIUM	MG/KG		0.5 U	OR
H: 0000	SUBSTRATE: SEDIMENT								
RIPTION:	DRUM #1								
			099580	34421	METHYL CHLORIDE	UG/KG		500 U	
				34416	METHYL BROMIDE	UG/KG		500 U	
				34495	VINYL CHLORIDE	UG/KG		500 U	
				34314	CHLOROETHANE	UG/KG		500 U	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

LTION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099580	34426	METHYLENE CHLORIDE	UG/KG		500 U	
				99930	ACETONE	UG/KG		500 U	
				99999	CARBON DISULFIDE	UG/KG		500 U	
				34504	1,1-DICHLOROETHYLENE	UG/KG		500 U	
				34499	1,1-DICHLOROETHANE	UG/KG		500 U	
				34549	1,2-TRANS DICHLOROETHYLENE	UG/KG		500 U	
				34318	CHLOROFORM	UG/KG		500 U	
				34534	1,2-DICHLOROETHANE	UG/KG		500 U	
				99999	2-BUTANONE	UG/KG		500 U	
				34509	1,1,1-TRICHLOROETHANE	UG/KG		500 U	
				34299	CARBON TETRACHLORIDE	UG/KG		500 U	
				99999	VINYL ACETATE	UG/KG		500 U	
				34330	DICHLOROBROMOMETHANE	UG/KG		500 U	
				34544	1,2-DICHLOROPROPANE	UG/KG		500 U	
				34564	1,3-DICHLOROPROPYLENE	UG/KG		500 U	
				34487	TRICHLOROETHYLENE	UG/KG		500 U	
				34237	BENZENE	UG/KG		500 U	
				99999	CIS-1,3-DICHLOROPROPENE	UG/KG		500 U	
				34309	CHLORODIBROMOMETHANE	UG/KG		500 U	
				34514	1,1,2-TRICHLOROETHANE	UG/KG		500 U	
				34290	BROMOFORM	UG/KG		500 U	
				34519	1,1,2,2-TETRACHLOROETHANE	UG/KG		500 U	
				34478	TETRACHLOROETHYLENE	UG/KG		500 U	
				34483	TOLUENE	UG/KG		500 U	
				34304	CHLOROBENZENE	UG/KG		500 U	
				34374	ETHYLBENZENE	UG/KG		500 U	
				99904	STYRENE	UG/KG		500 U	
				99999	XYLENES (TOTAL)	UG/KG		500 U	
				34589	2-CHLOROPHENOL	UG/KG		10 U	
				34594	2-NITROPHENOL	UG/KG		10 U	
				34695	PHENOL	UG/KG		10 U	
				34609	2,4-DIMETHYLPHENOL	UG/KG		10 U	
				34604	2,4-DICHLOROPHENOL	UG/KG		10 U	
				34624	2,4,6-TRICHLOROPHENOL	UG/KG		10 U	
				99999	P-CHLORO-M-CRESOL	UG/KG		10 U	
				34619	2,4-DINITROPHENOL	UG/KG		50 U	
				34660	4,6-DINITRO-O-CRESOL	UG/KG		50 U	
				99999	PENTACHLOROPHENOL	UG/KG		50 U	
				99999	4-NITROPHENOL	UG/KG		50 U	
				34569	1,3-DICHLOROBENZENE	UG/KG		10 U	
				34574	1,4-DICHLOROBENZENE	UG/KG		10 U	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

ATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099580	34539	1,2-DICHLOROBENZENE	UG/KG		10	U
				34399	HEXACHLOROETHANE	UG/KG		10	U
				34394	HEXACHLOROBUTADIENE	UG/KG		10	U
				34554	1,2,4-TRICHLOROBENZENE	UG/KG		10	U
				34445	NAPHTHALENE	UG/KG		10	U
				34276	BIS(2-CHLOROETHYL) ET.	UG/KG		10	U
				34281	BIS(2-CHLOROETHOXY) METH.	UG/KG		10	U
				34411	ISOPHORONE	UG/KG		10	U
				34450	NITROBENZENE	UG/KG		10	U
				34431	N-NITROSODI-N-PROPYLAMINE	UG/KG		10	U
				34436	N-NITROSODIPHENYLAMINE	UG/KG		10	U
				34286	BIS(2-CHLOROISOPROPYL) ETH	UG/KG		10	U
				34389	HEXACHLOROCYCLOPENTADIENE	UG/KG		10	U
				34584	2-CHLORONAPHTHALENE	UG/KG		10	U
				34203	ACENAPHTHYLENE	UG/KG		10	U
				34208	ACENAPHTHENE	UG/KG		10	U
				34384	FLUORENE	UG/KG		10	U
				39701	HEXACHLOROBENZENE	UG/KG		10	U
				34639	4-BROMOPHENYL PHENYL ET.	UG/KG		10	U
				34464	PHENANTHRENE	UG/KG		18	
				34223	ANTHRACENE	UG/KG		10	U
				34344	DIMETHYL PHTHALATE	UG/KG		10	U
				34339	DIETHYL PHTHALATE	UG/KG		10	U
				39112	DI-N-BUTYLPHTHALATE	UG/KG		10	U
				34295	BUTYL BENZYL PHTHALATE	UG/KG		68	
				34599	DI-N-OCTYL PHTHALATE	UG/KG		10	U
				39102	BIS(2-ETHYLHEXYL) PHTHAL.	UG/KG		260	
				34379	FLUORANTHENE	UG/KG		10	U
				34472	PYRENE	UG/KG		5.1	M
				34323	CHRYSENE	UG/KG		10	U
				34529	1,2-BENZANTHRACENE	UG/KG		10	U
				34644	4-CHLOROPHENYL PHENYL ET.	UG/KG		10	U
				34406	INDENO(1,2,3-C,D) PYRENE	UG/KG		10	U
				34250	BENZO(A)PYRENE	UG/KG		10	U
				34524	1,12-BENZOPERYLENE	UG/KG		10	U
				34559	1,2:5,6-DIBENZANTHRACENE	UG/KG		10	U
				34634	3,3'-DICHLOROBENZIDENE	UG/KG		10	U
				34629	2,6-DINITROTOLUENE	UG/KG		10	U
				34614	2,4-DINITROTOLUENE	UG/KG		10	U
				34349	1,2-DIPHENYLHYDRAZINE	UG/KG		10	U
				34233	3,4-BENZOFLUORANTHENE	UG/KG		10	U

NGI 2.2035

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

ROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

ON NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099580	34245	11,12-BENZOFLUORANTHENE	UG/KG		10 U	
				99999	BENZYL ALCOHOL	UG/KG		10 U	
				99999	2-METHYL PHENOL	UG/KG		10 U	
				99999	4-METHYL PHENOL	UG/KG		10 U	
				99999	BENZOIC ACID	UG/KG		10 U	
				77722	4-CHLOROANILINE	UG/KG		10 U	
				99999	ANILINE	UG/KG		10 U	
				99999	2-METHYL NAPHTHALENE	UG/KG		2.0 M	
				77733	2,4,5-TRICHLOROPHENOL	UG/KG		50 U	
				99999	2-NITROANILINE	UG/KG		50 U	
				99999	3-NITROANILINE	UG/KG		50 U	
				99999	DIBENZOFURAN	UG/KG		10 U	
				99999	4-NITROANILINE	UG/KG		50 U	
				01078	SILVER	MG/KG		5 U	
				01003	ARSENIC	MG/KG		1.0 U	OR
				01008	BARIUM	MG/KG		100 U	
				01028	CADMIUM	MG/KG		5 U	
				01029	CHROMIUM	MG/KG		5 U	
				71921	MERCURY	MG/KG		0.04 U	
				01052	LEAD	MG/KG		23	
				01148	SELENIUM	MG/KG		0.5 U	OR
	91/01/16	1522							
0000	SUBSTRATE: SEDIMENT								
PTION:	DRUM #2								
			099581	34421	METHYL CHLORIDE	UG/KG		420 U	
				34416	METHYL BROMIDE	UG/KG		420 U	
				34495	VINYL CHLORIDE	UG/KG		420 U	
				34314	CHLOROETHANE	UG/KG		420 U	
				34426	METHYLENE CHLORIDE	UG/KG		420 U	
				99930	ACETONE	UG/KG		420 U	
				99999	CARBON DISULFIDE	UG/KG		420 U	
				34504	1,1-DICHLOROETHYLENE	UG/KG		420 U	
				34499	1,1-DICHLOROETHANE	UG/KG		420 U	
				34549	1,2-TRANS DICHLOROETHYLENE	UG/KG		420 U	
				34318	CHLOROFORM	UG/KG		420 U	
				34534	1,2-DICHLOROETHANE	UG/KG		420 U	
				99999	2-BUTANONE	UG/KG		420 U	
				34509	1,1,1-TRICHLOROETHANE	UG/KG		420 U	
				34299	CARBON TETRACHLORIDE	UG/KG		420 U	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099581	99999	VINYL ACETATE	UG/KG		420	U
				34330	DICHLOROBROMOMETHANE	UG/KG		420	U
				34544	1,2-DICHLOROPROPANE	UG/KG		420	U
				34564	1,3-DICHLOROPROPYLENE	UG/KG		420	U
				34487	TRICHLOROETHYLENE	UG/KG		420	U
				34237	BENZENE	UG/KG		420	U
				99999	CIS-1,3-DICHLOROPROPENE	UG/KG		420	U
				34309	CHLORODIBROMOMETHANE	UG/KG		420	U
				34514	1,1,2-TRICHLOROETHANE	UG/KG		420	U
				34290	BROMOFORM	UG/KG		420	U
				34519	1,1,2,2-TETRACHLOROETHANE	UG/KG		420	U
				34478	TETRACHLOROETHYLENE	UG/KG		420	U
				34483	TOLUENE	UG/KG		420	U
				34304	CHLOROBENZENE	UG/KG		420	U
				34374	ETHYLBENZENE	UG/KG		420	U
				99904	STYRENE	UG/KG		420	U
				99999	XYLENES (TOTAL)	UG/KG		420	U
				34589	2-CHLOROPHENOL	UG/KG		10	U
				34594	2-NITROPHENOL	UG/KG		10	U
				34695	PHENOL	UG/KG		10	U
				34609	2,4-DIMETHYLPHENOL	UG/KG		10	U
				34604	2,4-DICHLOROPHENOL	UG/KG		10	U
				34624	2,4,6-TRICHLOROPHENOL	UG/KG		10	U
				99999	P-CHLORO-M-CRESOL	UG/KG		10	U
				34619	2,4-DINITROPHENOL	UG/KG		50	U
				34660	4,6-DINITRO-O-CRESOL	UG/KG		50	U
				99999	PENTACHLOROPHENOL	UG/KG		10	M
				99999	4-NITROPHENOL	UG/KG		50	U
				34569	1,3-DICHLOROBENZENE	UG/KG		10	U
				34574	1,4-DICHLOROBENZENE	UG/KG		10	U
				34539	1,2-DICHLOROBENZENE	UG/KG		10	U
				34399	HEXACHLOROETHANE	UG/KG		10	U
				34394	HEXACHLOROBUTADIENE	UG/KG		10	U
				34554	1,2,4-TRICHLOROBENZENE	UG/KG		10	U
				34445	NAPHTHALENE	UG/KG		10	U
				34276	BIS(2-CHLOROETHYL) ET.	UG/KG		10	U
				34281	BIS(2-CHLOROETHOXY) METH.	UG/KG		10	U
				34411	ISOPHORONE	UG/KG		10	U
				34450	NITROBENZENE	UG/KG		10	U
				34431	N-NITROSODI-N-PROPYLAMINE	UG/KG		10	U
				34436	N-NITROSODIPHENYLAMINE	UG/KG		10	U

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

)JECT NO: 979

PROJECT NAME: NELSON GALVANIZING

I NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099581	34286	BIS(2-CHLOROISOPROPYL) ETH	UG/KG		10	U
				34389	HEXACHLOROCYCLOPENTADIENE	UG/KG		10	U
				34584	2-CHLORONAPHTHALENE	UG/KG		10	U
				34203	ACENAPHTHYLENE	UG/KG		10	U
				34208	ACENAPHTHENE	UG/KG		10	U
				34384	FLUORENE	UG/KG		10	U
				39701	HEXACHLOROBENZENE	UG/KG		10	U
				34639	4-BROMOPHENYL PHENYL ET.	UG/KG		10	U
				34464	PHENANTHRENE	UG/KG		7.7	M
				34223	ANTHRACENE	UG/KG		10	U
				34344	DIMETHYL PHTHALATE	UG/KG		10	U
				34339	DIETHYL PHTHALATE	UG/KG		10	U
				39112	DI-N-BUTYLPPHTHALATE	UG/KG		10	U
				34295	BUTYL BENZYL PHTHALATE	UG/KG		320	
				34599	DI-N-OCTYL PHTHALATE	UG/KG		10	U
				39102	BIS(2-ETHYLHEXYL) PHTHAL.	UG/KG		760	
				34379	FLUORANTHENE	UG/KG		10	U
				34472	PYRENE	UG/KG		4.0	M
				34323	CHRYSENE	UG/KG		10	U
				34529	1,2-BENZANTHRACENE	UG/KG		10	U
				34644	4-CHLOROPHENYL PHENYL ET.	UG/KG		10	U
				34406	INDENO(1,2,3-C,D) PYRENE	UG/KG		10	U
				34250	BENZO(A)PYRENE	UG/KG		10	U
				34524	1,12-BENZOPERYLENE	UG/KG		10	U
				34559	1,2:5,6-DIBENZANTHRACENE	UG/KG		10	U
				34634	3,3'-DICHLOROBENZIDENE	UG/KG		10	U
				34629	2,6-DINITROTOLUENE	UG/KG		10	U
				34614	2,4-DINITROTOLUENE	UG/KG		10	U
				34349	1,2-DIPHENYLHYDRAZINE	UG/KG		10	U
				34233	3,4-BENZOFLUORANTHENE	UG/KG		10	U
				34245	11,12-BENZOFLUORANTHENE	UG/KG		10	U
				99999	BENZYL ALCOHOL	UG/KG		10	U
				99999	2-METHYL PHENOL	UG/KG		10	U
				99999	4-METHYL PHENOL	UG/KG		10	U
				99999	BENZOIC ACID	UG/KG		10	U
				77722	4-CHLOROANILINE	UG/KG		10	U
				99999	ANILINE	UG/KG		10	U
				99999	2-METHYL NAPHTHALENE	UG/KG		1.5	M
				77733	2,4,5-TRICHLOROPHENOL	UG/KG		50	U
				99999	2-NITROANILINE	UG/KG		50	U
				99999	3-NITROANILINE	UG/KG		50	U

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COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

ROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

ON NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099581	99999	DIBENZOFURAN	UG/KG		10 U	
				99999	4-NITROANILINE	UG/KG		50 U	
				01078	SILVER	MG/KG		5 U	
				01003	ARSENIC	MG/KG		2.0 U	
				01008	BARIUM	MG/KG		100 U	
				01028	CADMIUM	MG/KG		5 U	
				01029	CHROMIUM	MG/KG		5 U	
				71921	MERCURY	MG/KG		0.04 U	
				01052	LEAD	MG/KG		84	
				01148	SELENIUM	MG/KG		0.5 U	QR
	91/01/16	1540							
0000	SUBSTRATE: TCLP/AQ								
PTION:	SPILL AREA #2								
			099582	34418	METHYL CHLORIDE	UG/L	TOTAL	500 U	
				34413	METHYL BROMIDE	UG/L	TOTAL	500 U	
				39175	VINYL CHLORIDE	UG/L	TOTAL	500 U	
				34311	CHLOROETHANE	UG/L	TOTAL	500 U	
				34423	METHYLENE CHLORIDE	UG/L	TOTAL	500 U	
				99930	ACETONE	UG/L	TOTAL	500 U	
				99964	CARBON DISULFIDE	UG/L	TOTAL	500 U	
				34501	1,1-DICHLOROETHYLENE	UG/L	TOTAL	500 U	
				34496	1,1-DICHLOROETHANE	UG/L	TOTAL	500 U	
				34546	1,2-TRANS DICHLOROETHYLENE	UG/L	TOTAL	500 U	
				32106	CHLOROFORM	UG/L	TOTAL	500 U	
				32103	1,2-DICHLOROETHANE	UG/L	TOTAL	500 U	
				99999	2-BUTANONE	UG/L	TOTAL	500 U	
				34506	1,1,1-TRICHLOROETHANE	UG/L	TOTAL	500 U	
				32102	CARBON TETRACHLORIDE	UG/L	TOTAL	500 U	
				99999	VINYL ACETATE	UG/L	TOTAL	500 U	
				32101	DICHLOROBROMOMETHANE	UG/L	TOTAL	500 U	
				34541	1,2-DICHLOROPROPANE	UG/L	TOTAL	500 U	
				34561	1,3-DICHLOROPROPYLENE	UG/L	TOTAL	500 U	
				39180	TRICHLOROETHYLENE	UG/L	TOTAL	500 U	
				34030	BENZENE	UG/L	TOTAL	500 U	
				99999	CIS-1,3-DICHLOROPROPENE	UG/L	TOTAL	500 U	
				32105	CHLORODIBROMOMETHANE	UG/L	TOTAL	500 U	
				34511	1,1,2-TRICHLOROETHANE	UG/L	TOTAL	500 U	
				32104	BROMOFORM	UG/L	TOTAL	500 U	
				34516	1,1,2,2-TETRACHLOROETHANE	UG/L	TOTAL	500 U	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099582	34475	TETRACHLOROETHYLENE	UG/L	TOTAL	500	U
				34010	TOLUENE	UG/L	TOTAL	500	U
				34301	CHLOROBENZENE	UG/L	TOTAL	500	U
				34371	ETHYLBENZENE	UG/L	TOTAL	500	U
				99921	STYRENE	UG/L	TOTAL	500	U
				99920	XYLENES (TOTAL)	UG/L	TOTAL	500	U
				34586	2-CHLOROPHENOL	UG/L	TOTAL	10	U
				34591	2-NITROPHENOL	UG/L	TOTAL	10	U
				34694	PHENOL	UG/L	TOTAL	14	
				34606	2,4-DIMETHYLPHENOL	UG/L	TOTAL	10	U
				34601	2,4-DICHLOROPHENOL	UG/L	TOTAL	10	U
				34621	2,4,6-TRICHLOROPHENOL	UG/L	TOTAL	10	U
				34452	P-CHLORO-M-CRESOL	UG/L	TOTAL	10	U
				34616	2,4-DINITROPHENOL	UG/L	TOTAL	50	U
				34657	4,6-DINITRO-O-CRESOL	UG/L	TOTAL	50	U
				39032	PENTACHLOROPHENOL	UG/L	TOTAL	50	U
				34646	4-NITROPHENOL	UG/L	TOTAL	50	U
				34566	1,3-DICHLOROBENZENE	UG/L	TOTAL	10	U
				34571	1,4-DICHLOROBENZENE	UG/L	TOTAL	10	U
				34536	1,2-DICHLOROBENZENE	UG/L	TOTAL	10	U
				34396	HEXACHLOROETHANE	UG/L	TOTAL	10	U
				39702	HEXACHLOROBUTADIENE	UG/L	TOTAL	10	U
				34551	1,2,4-TRICHLOROBENZENE	UG/L	TOTAL	10	U
				34696	NAPHTHALENE	UG/L	TOTAL	10	U
				34273	BIS(2-CHLOROETHYL) ET.	UG/L	TOTAL	10	U
				34278	BIS(2-CHLOROETHOXY) METH.	UG/L	TOTAL	10	U
				34408	ISOPHORONE	UG/L	TOTAL	10	U
				34447	NITROBENZENE	UG/L	TOTAL	10	U
				34428	N-NITROSODI-N-PROPYLAMINE	UG/L	TOTAL	10	U
				34433	N-NITROSODIPHENYLAMINE	UG/L	TOTAL	10	U
				34283	BIS(2-CHLOROISOPROPYL) ET.	UG/L	TOTAL	10	U
				34386	HEXACHLOROCYCLOPENTADIENE	UG/L	TOTAL	10	U
				34581	2-CHLORONAPHTHALENE	UG/L	TOTAL	10	U
				34200	ACENAPHTHYLENE	UG/L	TOTAL	10	U
				34205	ACENAPHTHENE	UG/L	TOTAL	10	U
				34381	FLUORENE	UG/L	TOTAL	10	U
				39700	HEXACHLOROBENZENE	UG/L	TOTAL	10	U
				34636	4-BROMOPHENYL PHENYL ET.	UG/L	TOTAL	10	U
				34461	PHENANTHRENE	UG/L	TOTAL	10	U
				34220	ANTHRACENE	UG/L	TOTAL	10	U
				34341	DIMETHYL PHTHALATE	UG/L	TOTAL	10	U

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

STATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
099582				34336	DIETHYL PHTHALATE	UG/L	TOTAL	10 U	
				39110	DI-N-BUTYLPPHTHALATE	UG/L	TOTAL	10 U	
				34292	BUTYL BENZYL PHTHALATE	UG/L	TOTAL	10 U	
				34596	DI-N-OCTYL PHTHALATE	UG/L	TOTAL	10 U	
				39100	BIS(2-ETHYLHEXYL) PHTHAL.	UG/L	TOTAL	150	
				34376	FLUORANTHENE	UG/L	TOTAL	10 U	
				34469	PYRENE	UG/L	TOTAL	10 U	
				34320	CHRYSENE	UG/L	TOTAL	10 U	
				34526	1,2-BENZANTHRACENE	UG/L	TOTAL	10 U	
				34641	4-CHLOROPHENYL PHENYL ET.	UG/L	TOTAL	10 U	
				34403	INDENO(1,2,3-C,D) PYRENE	UG/L	TOTAL	10 U	
				34247	BENZO(A)PYRENE	UG/L	TOTAL	10 U	
				34521	1,12-BENZOPERYLENE	UG/L	TOTAL	10 U	
				34556	1,2:5,6-DIBENZANTHRACENE	UG/L	TOTAL	10 U	
				34631	3,3'-DICHLOROBENZIDENE	UG/L	TOTAL	10 U	
				34626	2,6-DINITROTOLUENE	UG/L	TOTAL	10 U	
				34611	2,4-DINITROTOLUENE	UG/L	TOTAL	10 U	
				34346	1,2-DIPHENYLHYDRAZINE	UG/L	TOTAL	10 U	
				34230	3,4-BENZOFLUORANTHENE	UG/L	TOTAL	10 U	
				34242	11,12-BENZOFLUORANTHENE	UG/L	TOTAL	10 U	
				99999	BENZYL ALCOHOL	UG/L	TOTAL	45	
				99999	2-METHYL PHENOL	UG/L	TOTAL	0.8 M	
				99999	4-METHYL PHENOL	UG/L	TOTAL	2.9	
				99999	BENZOIC ACID	UG/L	TOTAL	640 J	
				99999	4-CHLOROANILINE	UG/L	TOTAL	10 U	
				99999	ANILINE	UG/L	TOTAL	10 U	
				99999	2-METHYL NAPHTHALENE	UG/L	TOTAL	10 U	
				88894	2,4,5-TRICHLOROPHENOL	UG/L	TOTAL	50 U	
				99999	2-NITROANILINE	UG/L	TOTAL	50 U	
				99999	3-NITROANILINE	UG/L	TOTAL	50 U	
				99999	DIBENZOFURAN	UG/L	TOTAL	10 U	
				99999	4-NITROANILINE	UG/L	TOTAL	50 U	
				99920	CORROSIVITY	PH	TOTAL	1.47	
				99900	SILVER	MG/L		1 U	
				99901	ARSENIC	MG/L		0.2 U	OR
				99902	BARIUM	MG/L		20 U	
				99903	CADMIUM	MG/L		4.91	
				99904	CHROMIUM	MG/L		59.0	
				99905	MERCURY	MG/L		0.001	
				99906	LEAD	MG/L		2.65	
				99907	SELENIUM	MG/L		0.1 U	OR

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
	91/01/16	1556							
H: 0000	SUBSTRATE: TCLP/AQ								
RIPTION: DRUM #1									
			099583	34418	METHYL CHLORIDE	UG/L	TOTAL	500 U	
				34413	METHYL BROMIDE	UG/L	TOTAL	500 U	
				39175	VINYL CHLORIDE	UG/L	TOTAL	500 U	
				34311	CHLOROETHANE	UG/L	TOTAL	500 U	
				34423	METHYLENE CHLORIDE	UG/L	TOTAL	500 U	
				99930	ACETONE	UG/L	TOTAL	500 U	
				99964	CARBON DISULFIDE	UG/L	TOTAL	500 U	
				34501	1,1-DICHLOROETHYLENE	UG/L	TOTAL	500 U	
				34496	1,1-DICHLOROETHANE	UG/L	TOTAL	500 U	
				34546	1,2-TRANS DICHLOROETHYLENE	UG/L	TOTAL	500 U	
				32106	CHLOROFORM	UG/L	TOTAL	500 U	
				32103	1,2-DICHLOROETHANE	UG/L	TOTAL	500 U	
				99999	2-BUTANONE	UG/L	TOTAL	500 U	
				34506	1,1,1-TRICHLOROETHANE	UG/L	TOTAL	500 U	
				32102	CARBON TETRACHLORIDE	UG/L	TOTAL	500 U	
				99999	VINYL ACETATE	UG/L	TOTAL	500 U	
				32101	DICHLOROBROMOMETHANE	UG/L	TOTAL	500 U	
				34541	1,2-DICHLOROPROPANE	UG/L	TOTAL	500 U	
				34561	1,3-DICHLOROPROPYLENE	UG/L	TOTAL	500 U	
				39180	TRICHLOROETHYLENE	UG/L	TOTAL	500 U	
				34030	BENZENE	UG/L	TOTAL	500 U	
				99999	CIS-1,3-DICHLOROPROPENE	UG/L	TOTAL	500 U	
				32105	CHLORODIBROMOMETHANE	UG/L	TOTAL	500 U	
				34511	1,1,2-TRICHLOROETHANE	UG/L	TOTAL	500 U	
				32104	BROMOFORM	UG/L	TOTAL	500 U	
				34516	1,1,2,2-TETRACHLOROETHANE	UG/L	TOTAL	500 U	
				34475	TETRACHLOROETHYLENE	UG/L	TOTAL	500 U	
				34010	TOLUENE	UG/L	TOTAL	500 U	
				34301	CHLOROBENZENE	UG/L	TOTAL	500 U	
				34371	ETHYLBENZENE	UG/L	TOTAL	500 U	
				99921	STYRENE	UG/L	TOTAL	500 U	
				99920	XYLENES (TOTAL)	UG/L	TOTAL	500 U	
				34586	2-CHLOROPHENOL	UG/L	TOTAL	10 U	
				34591	2-NITROPHENOL	UG/L	TOTAL	10 U	
				34694	PHENOL	UG/L	TOTAL	10 U	
				34606	2,4-DIMETHYLPHENOL	UG/L	TOTAL	10 U	
				34601	2,4-DICHLOROPHENOL	UG/L	TOTAL	10 U	
				34621	2,4,6-TRICHLOROPHENOL	UG/L	TOTAL	10 U	
				34452	P-CHLORO-M-CRESOL	UG/L	TOTAL	10 U	
				34616	2,4-DINITROPHENOL	UG/L	TOTAL	50 U	
				34657	4,6-DINITRO-O-CRESOL	UG/L	TOTAL	50 U	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099583	39032	PENTACHLOROPHENOL	UG/L	TOTAL	50	U
				34646	4-NITROPHENOL	UG/L	TOTAL	50	U
				34566	1,3-DICHLOROBENZENE	UG/L	TOTAL	10	U
				34571	1,4-DICHLOROBENZENE	UG/L	TOTAL	10	U
				34536	1,2-DICHLOROBENZENE	UG/L	TOTAL	10	U
				34396	HEXACHLOROETHANE	UG/L	TOTAL	10	U
				39702	HEXACHLOROBUTADIENE	UG/L	TOTAL	10	U
				34551	1,2,4-TRICHLOROBENZENE	UG/L	TOTAL	10	U
				34696	NAPHTHALENE	UG/L	TOTAL	10	U
				34273	BIS(2-CHLOROETHYL) ET.	UG/L	TOTAL	10	U
				34278	BIS(2-CHLOROETHOXY) METH.	UG/L	TOTAL	10	U
				34408	ISOPHORONE	UG/L	TOTAL	10	U
				34447	NITROBENZENE	UG/L	TOTAL	10	U
				34428	N-NITROSODI-N-PROPYLAMINE	UG/L	TOTAL	10	U
				34433	N-NITROSODIPHENYLAMINE	UG/L	TOTAL	10	U
				34283	BIS(2-CHLOROISOPROPYL) ET.	UG/L	TOTAL	10	U
				34386	HEXACHLOROCYCLOPENTADIENE	UG/L	TOTAL	10	U
				34581	2-CHLORONAPHTHALENE	UG/L	TOTAL	10	U
				34200	ACENAPHTHYLENE	UG/L	TOTAL	10	U
				34205	ACENAPHTHENE	UG/L	TOTAL	10	U
				34381	FLUORENE	UG/L	TOTAL	10	U
				39700	HEXACHLOROBENZENE	UG/L	TOTAL	10	U
				34636	4-BROMOPHENYL PHENYL ET.	UG/L	TOTAL	10	U
				34461	PHENANTHRENE	UG/L	TOTAL	10	U
				34220	ANTHRACENE	UG/L	TOTAL	10	U
				34341	DIMETHYL PHTHALATE	UG/L	TOTAL	1.5	M
				34336	DIETHYL PHTHALATE	UG/L	TOTAL	10	U
				39110	DI-N-BUTYLPHTHALATE	UG/L	TOTAL	10	U
				34292	BUTYL BENZYL PHTHALATE	UG/L	TOTAL	0.8	M
				34596	DI-N-OCTYL PHTHALATE	UG/L	TOTAL	1.4	M
				39100	BIS(2-ETHYLHEXYL) PHTHAL.	UG/L	TOTAL	29	
				34376	FLUORANTHENE	UG/L	TOTAL	10	U
				34469	PYRENE	UG/L	TOTAL	10	U
				34320	CHRYSENE	UG/L	TOTAL	10	U
				34526	1,2-BENZANTHRACENE	UG/L	TOTAL	10	U
				34641	4-CHLOROPHENYL PHENYL ET.	UG/L	TOTAL	10	U
				34403	INDENO(1,2,3-C,D) PYRENE	UG/L	TOTAL	10	U
				34247	BENZO(A)PYRENE	UG/L	TOTAL	10	U
				34521	1,12-BENZOPERYLENE	UG/L	TOTAL	10	U
				34556	1,2:5,6-DIBENZANTHRACENE	UG/L	TOTAL	10	U
				34631	3,3'-DICHLOROBENZIDENE	UG/L	TOTAL	10	U

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099583	34626	2,6-DINITROTOLUENE	UG/L	TOTAL	10 U	
				34611	2,4-DINITROTOLUENE	UG/L	TOTAL	10 U	
				34346	1,2-DIPHENYLHYDRAZINE	UG/L	TOTAL	10 U	
				34230	3,4-BENZOFLUORANTHENE	UG/L	TOTAL	10 U	
				34242	11,12-BENZOFLUORANTHENE	UG/L	TOTAL	10 U	
				99999	BENZYL ALCOHOL	UG/L	TOTAL	10 U	
				99999	2-METHYL PHENOL	UG/L	TOTAL	10 U	
				99999	4-METHYL PHENOL	UG/L	TOTAL	10 U	
				99999	BENZOIC ACID	UG/L	TOTAL	6.1	
				99999	4-CHLOROANILINE	UG/L	TOTAL	10 U	
				99999	ANILINE	UG/L	TOTAL	10 U	
				99999	2-METHYL NAPHTHALENE	UG/L	TOTAL	10 U	
				88894	2,4,5-TRICHLOROPHENOL	UG/L	TOTAL	50 U	
				99999	2-NITROANILINE	UG/L	TOTAL	50 U	
				99999	3-NITROANILINE	UG/L	TOTAL	50 U	
				99999	DIBENZOFURAN	UG/L	TOTAL	10 U	
				99999	4-NITROANILINE	UG/L	TOTAL	50 U	
				99920	CORROSIVITY	PH	TOTAL	1.89	
				99900	SILVER	MG/L		1 U	
				99901	ARSENIC	MG/L		0.031	
				99902	BARIUM	MG/L		20 U	
				99903	CADMIUM	MG/L		1 U	
				99904	CHROMIUM	MG/L		350.00	
				99905	MERCURY	MG/L		0.0002 U	
				99906	LEAD	MG/L		4.32	
				99907	SELENIUM	MG/L		0.1 U	OR
E	91/01/16	1529							
TH: 0000	SUBSTRATE: TCLP/AQ								
CRIPTION:	DRUM #2								
			099584	34418	METHYL CHLORIDE	UG/L	TOTAL	500 U	
				34413	METHYL BROMIDE	UG/L	TOTAL	500 U	
				39175	VINYL CHLORIDE	UG/L	TOTAL	500 U	
				34311	CHLOROETHANE	UG/L	TOTAL	500 U	
				34423	METHYLENE CHLORIDE	UG/L	TOTAL	500 U	
				99930	ACETONE	UG/L	TOTAL	500 U	
				99964	CARBON DISULFIDE	UG/L	TOTAL	500 U	
				34501	1,1-DICHLOROETHYLENE	UG/L	TOTAL	500 U	
				34496	1,1-DICHLOROETHANE	UG/L	TOTAL	500 U	
				34546	1,2-TRANS DICHLOROETHYLENE	UG/L	TOTAL	500 U	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

STATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099584	32106	CHLOROFORM	UG/L	TOTAL	500 U	
				32103	1,2-DICHLOROETHANE	UG/L	TOTAL	500 U	
				99999	2-BUTANONE	UG/L	TOTAL	500 U	
				34506	1,1,1-TRICHLOROETHANE	UG/L	TOTAL	500 U	
				32102	CARBON TETRACHLORIDE	UG/L	TOTAL	500 U	
				99999	VINYL ACETATE	UG/L	TOTAL	500 U	
				32101	DICHLOROBROMOMETHANE	UG/L	TOTAL	500 U	
				34541	1,2-DICHLOROPROPANE	UG/L	TOTAL	500 U	
				34561	1,3-DICHLOROPROPYLENE	UG/L	TOTAL	500 U	
				39180	TRICHLOROETHYLENE	UG/L	TOTAL	500 U	
				34030	BENZENE	UG/L	TOTAL	500 U	
				99999	CIS-1,3-DICHLOROPROPENE	UG/L	TOTAL	500 U	
				32105	CHLORODIBROMOMETHANE	UG/L	TOTAL	500 U	
				34511	1,1,2-TRICHLOROETHANE	UG/L	TOTAL	500 U	
				32104	BROMOFORM	UG/L	TOTAL	500 U	
				34516	1,1,2,2-TETRACHLOROETHANE	UG/L	TOTAL	500 U	
				34475	TETRACHLOROETHYLENE	UG/L	TOTAL	500 U	
				34010	TOLUENE	UG/L	TOTAL	500 U	
				34301	CHLOROBENZENE	UG/L	TOTAL	500 U	
				34371	ETHYLBENZENE	UG/L	TOTAL	500 U	
				99921	STYRENE	UG/L	TOTAL	500 U	
				99920	XYLENES (TOTAL)	UG/L	TOTAL	500 U	
				34586	2-CHLOROPHENOL	UG/L	TOTAL	10 U	
				34591	2-NITROPHENOL	UG/L	TOTAL	10 U	
				34694	PHENOL	UG/L	TOTAL	1.0 M	
				34606	2,4-DIMETHYLPHENOL	UG/L	TOTAL	10 U	
				34601	2,4-DICHLOROPHENOL	UG/L	TOTAL	10 U	
				34621	2,4,6-TRICHLOROPHENOL	UG/L	TOTAL	10 U	
				34452	P-CHLORO-M-CRESOL	UG/L	TOTAL	10 U	
				34616	2,4-DINITROPHENOL	UG/L	TOTAL	50 U	
				34657	4,6-DINITRO-O-CRESOL	UG/L	TOTAL	50 U	
				39032	PENTACHLOROPHENOL	UG/L	TOTAL	50 U	
				34646	4-NITROPHENOL	UG/L	TOTAL	50 U	
				34566	1,3-DICHLOROBENZENE	UG/L	TOTAL	10 U	
				34571	1,4-DICHLOROBENZENE	UG/L	TOTAL	10 U	
				34536	1,2-DICHLOROBENZENE	UG/L	TOTAL	TOTAL	1.0 M
				34606	2,4-DIMETHYLPHENOL	UG/L	TOTAL	10 U	
				34601	2,4-DICHLOROPHENOL	UG/L	TOTAL	10 U	
				34621	2,4,6-TRICHLOROPHENOL	UG/L	TOTAL	10 U	
				34452	P-CHLORO-M-CRESOL	UG/L	TOTAL	10 U	
				34616	2,4-DINITROPHENOL	UG/L	TOTAL	50 U	
				34657	4,6-DINITRO-O-CRESOL	UG/L	TOTAL	50 U	
				39032	PENTACHLOROPHENOL	UG/L	TOTAL	50 U	
				34646	4-NITROPHENOL	UG/L	TOTAL	50 U	
				34566	1,3-DICHLOROBENZENE	UG/L	TOTAL	10 U	
				34571	1,4-DICHLOROBENZENE	UG/L	TOTAL	10 U	
				34536	1,2-DICHLOROBENZENE	UG/L	TOTAL	10 U	
				34396	HEXACHLOROETHANE	UG/L	TOTAL	10 U	
				39702	HEXACHLOROBUTADIENE	UG/L	TOTAL	10 U	
				34551	1,2,4-TRICHLOROBENZENE	UG/L	TOTAL	10 U	
				34696	NAPHTHALENE	UG/L	TOTAL	10 U	
				34273	BIS(2-CHLOROETHYL) ET.	UG/L	TOTAL	10 U	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

ON NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099584	34278	BIS(2-CHLOROETHOXY) METH.	UG/L	TOTAL	10 U	
				34408	ISOPHORONE	UG/L	TOTAL	10 U	
				34447	NITROBENZENE	UG/L	TOTAL	10 U	
				34428	N-NITROSODI-N-PROPYLAMINE	UG/L	TOTAL	10 U	
				34433	N-NITROSODIPHENYLAMINE	UG/L	TOTAL	10 U	
				34283	BIS(2-CHLOROISOPROPYL) ET.	UG/L	TOTAL	10 U	
				34386	HEXACHLOROCYCLOPENTADIENE	UG/L	TOTAL	10 U	
				34581	2-CHLORONAPHTHALENE	UG/L	TOTAL	10 U	
				34200	ACENAPHTHYLENE	UG/L	TOTAL	10 U	
				34205	ACENAPHTHENE	UG/L	TOTAL	10 U	

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COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

ITION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099584	32106	CHLOROFORM	UG/L	TOTAL	500	U
				32103	1,2-DICHLOROETHANE	UG/L	TOTAL	500	U
				99999	2-BUTANONE	UG/L	TOTAL	500	U
				34506	1,1,1-TRICHLOROETHANE	UG/L	TOTAL	500	U
				32102	CARBON TETRACHLORIDE	UG/L	TOTAL	500	U
				99999	VINYL ACETATE	UG/L	TOTAL	500	U
				32101	DICHLOROBROMOMETHANE	UG/L	TOTAL	500	U
				34541	1,2-DICHLOROPROPANE	UG/L	TOTAL	500	U
				34561	1,3-DICHLOROPROPYLENE	UG/L	TOTAL	500	U
				39180	TRICHLOROETHYLENE	UG/L	TOTAL	500	U
				34030	BENZENE	UG/L	TOTAL	500	U
				99999	CIS-1,3-DICHLOROPROPENE	UG/L	TOTAL	500	U
				32105	CHLORODIBROMOMETHANE	UG/L	TOTAL	500	U
				34511	1,1,2-TRICHLOROETHANE	UG/L	TOTAL	500	U
				32104	BROMOFORM	UG/L	TOTAL	500	U
				34516	1,1,2,2-TETRACHLOROETHANE	UG/L	TOTAL	500	U
				34475	TETRACHLOROETHYLENE	UG/L	TOTAL	500	U
				34010	TOLUENE	UG/L	TOTAL	500	U
				34301	CHLOROBENZENE	UG/L	TOTAL	500	U
				34371	ETHYLBENZENE	UG/L	TOTAL	500	U
				99921	STYRENE	UG/L	TOTAL	500	U
				99920	XYLENES (TOTAL)	UG/L	TOTAL	500	U
				34586	2-CHLOROPHENOL	UG/L	TOTAL	10	U
				34591	2-NITROPHENOL	UG/L	TOTAL	10	U
				34694	PHENOL	UG/L	TOTAL	1.0	M
				34606	2,4-DIMETHYLPHENOL	UG/L	TOTAL	10	U
				34601	2,4-DICHLOROPHENOL	UG/L	TOTAL	10	U
				34621	2,4,6-TRICHLOROPHENOL	UG/L	TOTAL	10	U
				34452	P-CHLORO-M-CRESOL	UG/L	TOTAL	10	U
				34616	2,4-DINITROPHENOL	UG/L	TOTAL	50	U
				34657	4,6-DINITRO-O-CRESOL	UG/L	TOTAL	50	U
				39032	PENTACHLOROPHENOL	UG/L	TOTAL	50	U
				34646	4-NITROPHENOL	UG/L	TOTAL	50	U
				34566	1,3-DICHLOROBENZENE	UG/L	TOTAL	10	U
				34571	1,4-DICHLOROBENZENE	UG/L	TOTAL	10	U
				34536	1,2-DICHLOROBENZENE	UG/L	TOTAL	10	U
				34396	HEXACHLOROETHANE	UG/L	TOTAL	10	U
				39702	HEXACHLOROBUTADIENE	UG/L	TOTAL	10	U
				34551	1,2,4-TRICHLOROBENZENE	UG/L	TOTAL	10	U
				34696	NAPHTHALENE	UG/L	TOTAL	10	U
				34273	BIS(2-CHLOROETHYL) ET.	UG/L	TOTAL	10	U

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099584	34278	BIS(2-CHLOROETHOXY) METH.	UG/L	TOTAL	10 U	
				34408	ISOPHORONE	UG/L	TOTAL	10 U	
				34447	NITROBENZENE	UG/L	TOTAL	10 U	
				34428	N-NITROSODI-N-PROPYLAMINE	UG/L	TOTAL	10 U	
				34433	N-NITROSODIPHENYLAMINE	UG/L	TOTAL	10 U	
				34283	BIS(2-CHLOROISOPROPYL) ET.	UG/L	TOTAL	10 U	
				34386	HEXACHLOROCYCLOPENTADIENE	UG/L	TOTAL	10 U	
				34581	2-CHLORONAPHTHALENE	UG/L	TOTAL	10 U	
				34200	ACENAPHTHYLENE	UG/L	TOTAL	10 U	
				34205	ACENAPHTHENE	UG/L	TOTAL	10 U	
				34381	FLUORENE	UG/L	TOTAL	10 U	
				39700	HEXACHLOROBENZENE	UG/L	TOTAL	10 U	
				34636	4-BROMOPHENYL PHENYL ET.	UG/L	TOTAL	10 U	
				34461	PHENANTHRENE	UG/L	TOTAL	10 U	
				34220	ANTHRACENE	UG/L	TOTAL	10 U	
				34341	DIMETHYL PHTHALATE	UG/L	TOTAL	10 U	
				34336	DIETHYL PHTHALATE	UG/L	TOTAL	10 U	
				39110	DI-N-BUTYLPHTHALATE	UG/L	TOTAL	10 U	
				34292	BUTYL BENZYL PHTHALATE	UG/L	TOTAL	10 U	
				34596	DI-N-OCTYL PHTHALATE	UG/L	TOTAL	10 U	
				39100	BIS(2-ETHYLHEXYL) PHTHAL.	UG/L	TOTAL	10 U	
				34376	FLUORANTHENE	UG/L	TOTAL	10 U	
				34469	PYRENE	UG/L	TOTAL	10 U	
				34320	CHRYSENE	UG/L	TOTAL	10 U	
				34526	1,2-BENZANTHRACENE	UG/L	TOTAL	10 U	
				34641	4-CHLOROPHENYL PHENYL ET.	UG/L	TOTAL	10 U	
				34403	INDENO(1,2,3-C,D) PYRENE	UG/L	TOTAL	10 U	
				34247	BENZO(A)PYRENE	UG/L	TOTAL	10 U	
				34521	1,12-BENZOPERYLENE	UG/L	TOTAL	10 U	
				34556	1,2:5,6-DIBENZANTHRACENE	UG/L	TOTAL	10 U	
				34631	3,3'-DICHLOROBENZIDENE	UG/L	TOTAL	10 U	
				34626	2,6-DINITROTOLUENE	UG/L	TOTAL	10 U	
				34611	2,4-DINITROTOLUENE	UG/L	TOTAL	10 U	
				34346	1,2-DIPHENYLHYDRAZINE	UG/L	TOTAL	10 U	
				34230	3,4-BENZOFLUORANTHENE	UG/L	TOTAL	10 U	
				34242	11,12-BENZOFLUORANTHENE	UG/L	TOTAL	10 U	
				99999	BENZYL ALCOHOL	UG/L	TOTAL	10 U	
				99999	2-METHYL PHENOL	UG/L	TOTAL	10 U	
				99999	4-METHYL PHENOL	UG/L	TOTAL	10 U	
				99999	BENZOIC ACID	UG/L	TOTAL	10 U	
				99999	4-CHLOROANILINE	UG/L	TOTAL	10 U	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

ATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099584	99999	ANILINE	UG/L	TOTAL	10 U	
				99999	2-METHYL NAPHTHALENE	UG/L	TOTAL	2.0 M	
				88894	2,4,5-TRICHLOROPHENOL	UG/L	TOTAL	50 U	
				99999	2-NITROANILINE	UG/L	TOTAL	50 U	
				99999	3-NITROANILINE	UG/L	TOTAL	50 U	
				99999	DIBENZOFURAN	UG/L	TOTAL	10 U	
				99999	4-NITROANILINE	UG/L	TOTAL	50 U	
				99920	CORROSIVITY	PH	TOTAL	1.60	
				99900	SILVER	MG/L		1 U	
				99901	ARSENIC	MG/L		0.2 U	OR
				99902	BARIUM	MG/L		20 U	
				99903	CADMIUM	MG/L		1 U	
				99904	CHROMIUM	MG/L		52.6	
				99905	MERCURY	MG/L		0.0002 U	
				99906	LEAD	MG/L		6.29	
				99907	SELENIUM	MG/L		0.1 U	OR
	91/01/16	1538							
N: 0000	SUBSTRATE: TCLP								
RIPTION:	SPILL AREA #1								
			099585	99999	METHYL CHLORIDE	MG/L		0.05 U	
				99999	METHYL BROMIDE	MG/L		0.05 U	
				99999	VINYL CHLORIDE	MG/L		0.05 U	
				99999	CHLOROETHANE	MG/L		0.05 U	
				99999	METHYLENE CHLORIDE	MG/L		0.05 U	
				99999	ACETONE	MG/L		0.05 U	
				99999	CARBON DISULFIDE	MG/L		0.05 U	
				99999	1,1-DICHLOROETHYLENE	MG/L		0.05 U	
				99999	1,1-DICHLOROETHANE	MG/L		0.05 U	
				99999	1,2-TRANS DICHLOROETHYLENE	MG/L		0.05 U	
				99999	CHLOROFORM	MG/L		0.05 U	
				99999	1,2-DICHLOROETHANE	MG/L		0.05 U	
				99999	2-BUTANONE	MG/L		0.05 U	
				99999	1,1,1-TRICHLOROETHANE	MG/L		0.05 U	
				99999	CARBON TETRACHLORIDE	MG/L		0.05 U	
				99999	VINYL ACETATE	MG/L		0.05 U	
				99999	DICHLOROBROMOMETHANE	MG/L		0.05 U	
				99999	1,2-DICHLOROPROPANE	MG/L		0.05 U	
				99999	1,3-DICHLOROPROPYLENE	MG/L		0.05 U	
				99999	TRICHLOROETHYLENE	MG/L		0.05 U	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

ATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099585	99999	BENZENE	MG/L		0.05	U
				99999	CIS-1,3-DICHLOROPROPENE	MG/L		0.05	U
				99999	CHLORODIBROMOMETHANE	MG/L		0.05	U
				99999	1,1,2-TRICHLOROETHANE	MG/L		0.05	U
				99999	BROMOFORM	MG/L		0.05	U
				99999	1,1,2,2-TETRACHLOROETHANE	MG/L		0.05	U
				99999	TETRACHLOROETHYLENE	MG/L		0.05	U
				99999	TOLUENE	MG/L		0.05	U
				99999	CHLOROBENZENE	MG/L		0.05	U
				99999	ETHYLBENZENE	MG/L		0.05	U
				99999	STYRENE	MG/L		0.05	U
				99999	XYLENES (TOTAL)	MG/L		0.05	U
				99999	2-CHLOROPHENOL	MG/L		0.01	U
				99999	2-NITROPHENOL	MG/L		0.01	U
				99999	PHENOL	MG/L		0.0041	
				99999	2,4-DIMETHYLPHENOL	MG/L		0.01	U
				99999	2,4-DICHLOROPHENOL	MG/L		0.01	U
				99999	2,4,6-TRICHLOROPHENOL	MG/L		0.01	U
				99999	P-CHLORO-M-CRESOL	MG/L		0.01	U
				99999	2,4-DINITROPHENOL	MG/L		0.05	U
				99999	4,6-DINITRO-O-CRESOL	MG/L		0.05	U
				99999	PENTACHLOROPHENOL	MG/L		0.05	U
				99999	4-NITROPHENOL	MG/L		0.05	U
				99999	1,3-DICHLOROBENZENE	MG/L		0.01	U
				99999	1,4-DICHLOROBENZENE	MG/L		0.01	U
				99999	1,2-DICHLOROBENZENE	MG/L		0.01	U
				99999	HEXACHLOROETHANE	MG/L		0.01	U
				99999	HEXACHLOROBUTADIENE	MG/L		0.01	U
				99999	1,2,4-TRICHLOROBENZENE	MG/L		0.01	U
				99999	NAPHTHALENE	MG/L		0.01	U
				99999	BIS(2-CHLOROETHYL) ET.	MG/L		0.01	U
				99999	BIS(2-CHLOROETHOXY) METH.	MG/L		0.01	U
				99999	ISOPHORONE	MG/L		0.01	U
				99999	NITROBENZENE	MG/L		0.01	U
				99999	N-NITROSODI-N-PROPYLAMINE	MG/L		0.01	U
				99999	N-NITROSODIPHENYLAMINE	MG/L		0.01	U
				99999	N-NITROSODIPHENYLAMINE	MG/L		0.01	U
				99999	BIS(2-CHLOROISOPROPYL) ETH	MG/L		0.01	U
				34389	HEXACHLOROCYCLOPENTADIENE	MG/L		0.01	U
				99999	2-CHLORONAPHTHALENE	MG/L		0.01	U
				99999	ACENAPHTHYLENE	MG/L		0.01	U

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COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099585	99999	ACENAPHTHENE	MG/L		0.01 U	
				99999	FLUORENE	MG/L		0.01 U	
				99999	HEXACHLOROBENZENE	MG/L		0.01 U	
				99999	4-BROMOPHENYL PHENYL ET.	MG/L		0.01 U	
				99999	PHENANTHRENE	MG/L		0.01 U	
				99999	ANTHRACENE	MG/L		0.01 U	
				99999	DIMETHYL PHTHALATE	MG/L		0.01 U	
				99999	DIETHYL PHTHALATE	MG/L		0.01 U	
				99999	DI-N-BUTYLPPHTHALATE	MG/L		0.01 U	
				99999	BUTYL BENZYL PHTHALATE	MG/L		0.01 U	
				99999	DI-N-OCTYL PHTHALATE	MG/L		0.01 U	
				99999	BIS(2-ETHYLHEXYL) PHTHAL.	MG/L		0.01 U	
				99999	FLUORANTHENE	MG/L		0.01 U	
				99999	PYRENE	MG/L		0.01 U	
				99999	CHRYSENE	MG/L		0.01 U	
				99999	1,2-BENZANTHRACENE	MG/L		0.01 U	
				99999	4-CHLOROPHENYL PHENYL ET.	MG/L		0.01 U	
				99999	INDENO(1,2,3-C,D) PYRENE	MG/L		0.01 U	
				99999	BENZO(A)PYRENE	MG/L		0.01 U	
				99999	1,12-BENZOPERYLENE	MG/L		0.01 U	
				99999	1,2:5,6-DIBENZANTHRACENE	MG/L		0.01 U	
				99999	3,3'-DICHLOROBENZIDENE	MG/L		0.01 U	
				99999	2,6-DINITROTOLUENE	MG/L		0.01 U	
				99999	2,4-DINITROTOLUENE	MG/L		0.01 U	
				99999	1,2-DIPHENYLHYDRAZINE	MG/L		0.01 U	
				99999	3,4-BENZOFLUORANTHENE	MG/L		0.01 U	
				99999	11,12-BENZOFLUORANTHENE	MG/L		0.01 U	
				99999	BENZYL ALCOHOL	MG/L		0.01 U	
				99999	2-METHYL PHENOL	MG/L		0.01 U	
				99999	4-METHYL PHENOL	MG/L		0.0012 M	QG
				99999	BENZOIC ACID	MG/L		0.23 J	
				99999	4-CHLOROANILINE	MG/L		0.01 U	
				99999	ANILINE	MG/L		0.01 U	
				99999	2-METHYLNAPHTHALENE	MG/L		0.01 U	
				99999	2,4,5-TRICHLOROPHENOL	MG/L		0.05 U	
				99999	2-NITROANILINE	MG/L		0.05 U	
				99999	3-NITROANILINE	MG/L		0.05 U	
				99999	DIBENZOFURAN	MG/L		0.01 U	
				99999	4-NITROANILINE	MG/L		0.05 U	
				99920	CORROSIVITY	PH	TOTAL	6.63	
				99900	SILVER	MG/L		0.01 U	

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COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TATION NO	DATE FROM TO	TIME OF DAY
IE	91/01/16	1540
TH: 0000	SUBSTRATE: TCLP	
CRIPTION:	SPILL AREA #2	

LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
099585	99901	ARSENIC	MG/L		0.2 U	
	99902	BARIUM	MG/L		0.2 U	
	99903	CADMIUM	MG/L		0.15	
	99904	CHROMIUM	MG/L		0.01 U	
	99905	MERCURY	MG/L		0.0002 U	
	99906	LEAD	MG/L		0.02 U	
	99907	SELENIUM	MG/L		0.1 U	OR
099586	99999	METHYL CHLORIDE	MG/L		0.05 U	
	99999	METHYL BROMIDE	MG/L		0.05 U	
	99999	VINYL CHLORIDE	MG/L		0.05 U	
	99999	CHLOROETHANE	MG/L		0.05 U	
	99999	METHYLENE CHLORIDE	MG/L		0.05 U	
	99999	ACETONE	MG/L		0.05 U	
	99999	CARBON DISULFIDE	MG/L		0.05 U	
	99999	1,1-DICHLOROETHYLENE	MG/L		0.05 U	
	99999	1,1-DICHLOROETHANE	MG/L		0.05 U	
	99999	1,2-TRANS DICHLOROETHYLENE	MG/L		0.05 U	
	99999	CHLOROFORM	MG/L		0.05 U	
	99999	1,2-DICHLOROETHANE	MG/L		0.05 U	
	99999	2-BUTANONE	MG/L		0.05 U	
	99999	1,1,1-TRICHLOROETHANE	MG/L		0.05 U	
	99999	CARBON TETRACHLORIDE	MG/L		0.05 U	
	99999	VINYL ACETATE	MG/L		0.05 U	
	99999	DICHLOROBROMOMETHANE	MG/L		0.05 U	
	99999	1,2-DICHLOROPROPANE	MG/L		0.05 U	
	99999	1,3-DICHLOROPROPYLENE	MG/L		0.05 U	
	99999	TRICHLOROETHYLENE	MG/L		0.05 U	
	99999	BENZENE	MG/L		0.05 U	
	99999	CIS-1,3-DICHLOROPROPENE	MG/L		0.05 U	
	99999	CHLORODIBROMOMETHANE	MG/L		0.05 U	
	99999	1,1,2-TRICHLOROETHANE	MG/L		0.05 U	
	99999	BROMOFORM	MG/L		0.05 U	
	99999	1,1,2,2-TETRACHLOROETHANE	MG/L		0.05 U	
	99999	TETRACHLOROETHYLENE	MG/L		0.05 U	
	99999	TOLUENE	MG/L		0.05 U	
	99999	CHLOROBENZENE	MG/L		0.05 U	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

ATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099586	99999	ETHYLBENZENE	MG/L		0.05	U
				99999	STYRENE	MG/L		0.05	U
				99999	XYLENES (TOTAL)	MG/L		0.05	U
				99999	2-CHLOROPHENOL	MG/L		0.01	U
				99999	2-NITROPHENOL	MG/L		0.01	U
				99999	PHENOL	MG/L		0.0083	
				99999	2,4-DIMETHYLPHENOL	MG/L		0.01	U
				99999	2,4-DICHLOROPHENOL	MG/L		0.01	U
				99999	2,4,6-TRICHLOROPHENOL	MG/L		0.01	U
				99999	P-CHLORO-M-CRESOL	MG/L		0.01	U
				99999	2,4-DINITROPHENOL	MG/L		0.05	U
				99999	4,6-DINITRO-O-CRESOL	MG/L		0.05	U
				99999	PENTACHLOROPHENOL	MG/L		0.05	U
				99999	4-NITROPHENOL	MG/L		0.05	U
				99999	1,3-DICHLOROBENZENE	MG/L		0.01	U
				99999	1,4-DICHLOROBENZENE	MG/L		0.01	U
				99999	1,2-DICHLOROBENZENE	MG/L		0.01	U
				99999	HEXACHLOROETHANE	MG/L		0.01	U
				99999	HEXACHLOROBUTADIENE	MG/L		0.01	U
				99999	1,2,4-TRICHLOROBENZENE	MG/L		0.01	U
				99999	NAPHTHALENE	MG/L		0.01	U
				99999	BIS(2-CHLOROETHYL) ET.	MG/L		0.01	U
				99999	BIS(2-CHLOROETHOXY) METH.	MG/L		0.01	U
				99999	ISOPHORONE	MG/L		0.01	U
				99999	NITROBENZENE	MG/L		0.01	U
				99999	N-NITROSODI-N-PROPYLAMINE	MG/L		0.01	U
				99999	N-NITROSODIPHENYLAMINE	MG/L		0.01	U
				99999	N-NITROSODIPHENYLAMINE	MG/L		0.01	U
				99999	BIS(2-CHLOROISOPROPYL) ETH	MG/L		0.01	U
				34389	HEXACHLOROCYCLOPENTADIENE	MG/L		0.01	U
				99999	2-CHLORONAPHTHALENE	MG/L		0.01	U
				99999	ACENAPHTHYLENE	MG/L		0.01	U
				99999	ACENAPHTHENE	MG/L		0.01	U
				99999	FLUORENE	MG/L		0.01	U
				99999	HEXACHLOROBENZENE	MG/L		0.01	U
				99999	4-BROMOPHENYL PHENYL ET.	MG/L		0.01	U
				99999	PHENANTHRENE	MG/L		0.01	U
				99999	ANTHRACENE	MG/L		0.01	U
				99999	DIMETHYL PHTHALATE	MG/L		0.01	U
				99999	DIETHYL PHTHALATE	MG/L		0.040	
				99999	DI-N-BUTYLPPHTHALATE	MG/L		0.01	U

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099586	99999	BUTYL BENZYL PHTHALATE	MG/L		0.01 U	
				99999	DI-N-OCTYL PHTHALATE	MG/L		0.01 U	
				99999	BIS(2-ETHYLHEXYL) PHTHAL.	MG/L		0.01 U	
				99999	FLUORANTHENE	MG/L		0.01 U	
				99999	PYRENE	MG/L		0.01 U	
				99999	CHRYSENE	MG/L		0.01 U	
				99999	1,2-BENZANTHRACENE	MG/L		0.01 U	
				99999	4-CHLOROPHENYL PHENYL ET.	MG/L		0.01 U	
				99999	INDENO(1,2,3-C,D) PYRENE	MG/L		0.01 U	
				99999	BENZO(A)PYRENE	MG/L		0.01 U	
				99999	1,12-BENZOPERYLENE	MG/L		0.01 U	
				99999	1,2:5,6-DIBENZANTHRACENE	MG/L		0.01 U	
				99999	3,3'-DICHLOROBENZIDENE	MG/L		0.01 U	
				99999	2,6-DINITROTOLUENE	MG/L		0.01 U	
				99999	2,4-DINITROTOLUENE	MG/L		0.01 U	
				99999	1,2-DIPHENYLHYDRAZINE	MG/L		0.01 U	
				99999	3,4-BENZOFLUORANTHENE	MG/L		0.01 U	
				99999	11,12-BENZOFLUORANTHENE	MG/L		0.01 U	
				99999	BENZYL ALCOHOL	MG/L		0.0028 J	OG
				99999	2-METHYL PHENOL	MG/L		0.01 U	
				99999	4-METHYL PHENOL	MG/L		0.043	OG
				99999	BENZOIC ACID	MG/L		0.01 U	
				99999	4-CHLOROANILINE	MG/L		0.01 U	
				99999	ANILINE	MG/L		0.01 U	
				99999	2-METHYLNAPHTHALENE	MG/L		0.01 U	
				99999	2,4,5-TRICHLOROPHENOL	MG/L		0.05 U	
				99999	2-NITROANILINE	MG/L		0.05 U	
				99999	3-NITROANILINE	MG/L		0.05 U	
				99999	DIBENZOFURAN	MG/L		0.01 U	
				99999	4-NITROANILINE	MG/L		0.05 U	
				99920	CORROSIVITY	PH	TOTAL	3.22	
				99900	SILVER	MG/L		0.01 U	
				99901	ARSENIC	MG/L		0.2 U	
				99902	BARIUM	MG/L		2 U	
				99903	CADMIUM	MG/L		0.14	
				99904	CHROMIUM	MG/L		0.1 U	
				99905	MERCURY	MG/L		0.0002 U	
				99906	LEAD	MG/L		0.2 U	
				99907	SELENIUM	MG/L		0.1 U	OR

NGI 2.2054

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TION NO	DATE FROM TO	TIME OF DAY
	91/01/16	1546

H: 0000 SUBSTRATE: TCLP
RIPTION: SPILL AREA #3

LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
099587	99999	METHYL CHLORIDE	MG/L		0.05	U
	99999	METHYL BROMIDE	MG/L		0.05	U
	99999	VINYL CHLORIDE	MG/L		0.05	U
	99999	CHLOROETHANE	MG/L		0.05	U
	99999	METHYLENE CHLORIDE	MG/L		0.05	U
	99999	ACETONE	MG/L		0.05	U
	99999	CARBON DISULFIDE	MG/L		0.05	U
	99999	1,1-DICHLOROETHYLENE	MG/L		0.05	U
	99999	1,1-DICHLOROETHANE	MG/L		0.05	U
	99999	1,2-TRANS DICHLOROETHYLENE	MG/L		0.05	U
	99999	CHLOROFORM	MG/L		0.05	U
	99999	1,2-DICHLOROETHANE	MG/L		0.05	U
	99999	2-BUTANONE	MG/L		0.05	U
	99999	1,1,1-TRICHLOROETHANE	MG/L		0.05	U
	99999	CARBON TETRACHLORIDE	MG/L		0.05	U
	99999	VINYL ACETATE	MG/L		0.05	U
	99999	DICHLOROBROMOMETHANE	MG/L		0.05	U
	99999	1,2-DICHLOROPROPANE	MG/L		0.05	U
	99999	1,3-DICHLOROPROPYLENE	MG/L		0.05	U
	99999	TRICHLOROETHYLENE	MG/L		0.05	U
	99999	BENZENE	MG/L		0.05	U
	99999	CIS-1,3-DICHLOROPROPENE	MG/L		0.05	U
	99999	CHLORODIBROMOMETHANE	MG/L		0.05	U
	99999	1,1,2-TRICHLOROETHANE	MG/L		0.05	U
	99999	BROMOFORM	MG/L		0.05	U
	99999	1,1,2,2-TETRACHLOROETHANE	MG/L		0.05	U
	99999	TETRACHLOROETHYLENE	MG/L		0.05	U
	99999	TOLUENE	MG/L		0.05	U
	99999	CHLOROBENZENE	MG/L		0.05	U
	99999	ETHYLBENZENE	MG/L		0.05	U
	99999	STYRENE	MG/L		0.05	U
	99999	XYLENES (TOTAL)	MG/L		0.05	U
	99999	2-CHLOROPHENOL	MG/L		0.01	U
	99999	2-NITROPHENOL	MG/L		0.01	U
	99999	PHENOL	MG/L		0.0029	
	99999	2,4-DIMETHYLPHENOL	MG/L		0.01	U
	99999	2,4-DICHLOROPHENOL	MG/L		0.01	U
	99999	2,4,6-TRICHLOROPHENOL	MG/L		0.01	U
	99999	P-CHLORO-M-CRESOL	MG/L		0.0012	M
	99999	2,4-DINITROPHENOL	MG/L		0.05	U
	99999	4,6-DINITRO-O-CRESOL	MG/L		0.05	U

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

ION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099587	99999	PENTACHLOROPHENOL	MG/L		0.05	U
				99999	4-NITROPHENOL	MG/L		0.05	U
				99999	1,3-DICHLOROBENZENE	MG/L		0.01	U
				99999	1,4-DICHLOROBENZENE	MG/L		0.01	U
				99999	1,2-DICHLOROBENZENE	MG/L		0.01	U
				99999	HEXACHLOROETHANE	MG/L		0.01	U
				99999	HEXACHLOROBUTADIENE	MG/L		0.01	U
				99999	1,2,4-TRICHLOROBENZENE	MG/L		0.01	U
				99999	NAPHTHALENE	MG/L		0.01	U
				99999	BIS(2-CHLOROETHYL) ET.	MG/L		0.01	U
				99999	BIS(2-CHLOROETHOXY) METH.	MG/L		0.01	U
				99999	ISOPHORONE	MG/L		0.01	U
				99999	NITROBENZENE	MG/L		0.01	U
				99999	N-NITROSODI-N-PROPYLAMINE	MG/L		0.01	U
				99999	N-NITROSODIPHENYLAMINE	MG/L		0.01	U
				99999	N-NITROSODIPHENYLAMINE	MG/L		0.01	U
				99999	BIS(2-CHLOROISOPROPYL) ETH	MG/L		0.01	U
				34389	HEXACHLOROCYCLOPENTADIENE	MG/L		0.01	U
				99999	2-CHLORONAPHTHALENE	MG/L		0.01	U
				99999	ACENAPHTHYLENE	MG/L		0.01	U
				99999	ACENAPHTHENE	MG/L		0.01	U
				99999	FLUORENE	MG/L		0.01	U
				99999	HEXACHLOROBENZENE	MG/L		0.01	U
				99999	4-BROMOPHENYL PHENYL ET.	MG/L		0.01	U
				99999	PHENANTHRENE	MG/L		0.0004	M
				99999	ANTHRACENE	MG/L		0.01	U
				99999	DIMETHYL PHTHALATE	MG/L		0.01	U
				99999	DIETHYL PHTHALATE	MG/L		0.0047	
				99999	DI-N-BUTYLPHTHALATE	MG/L		0.01	U
				99999	BUTYL BENZYL PHTHALATE	MG/L		0.0082	
				99999	DI-N-OCTYL PHTHALATE	MG/L		0.01	U
				99999	BIS(2-ETHYLHEXYL) PHTHAL.	MG/L		0.01	U
				99999	FLUORANTHENE	MG/L		0.01	U
				99999	PYRENE	MG/L		0.01	U
				99999	CHRYSENE	MG/L		0.01	U
				99999	1,2-BENZANTHRACENE	MG/L		0.01	U
				99999	4-CHLOROPHENYL PHENYL ET.	MG/L		0.01	U
				99999	INDENO(1,2,3-C,D) PYRENE	MG/L		0.01	U
				99999	BENZO(A)PYRENE	MG/L		0.01	U
				99999	1,12-BENZOPERYLENE	MG/L		0.01	U
				99999	1,2:5,6-DIBENZANTHRACENE	MG/L		0.01	U

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

STATION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099587	99999	3,3'-DICHLOROBENZIDENE	MG/L		0.01 U	
				99999	2,6-DINITROTOLUENE	MG/L		0.01 U	
				99999	2,4-DINITROTOLUENE	MG/L		0.01 U	
				99999	1,2-DIPHENYLHYDRAZINE	MG/L		0.01 U	
				99999	3,4-BENZOFLUORANTHENE	MG/L		0.01 U	
				99999	11,12-BENZOFLUORANTHENE	MG/L		0.01 U	
				99999	BENZYL ALCOHOL	MG/L		0.01 U	
				99999	2-METHYL PHENOL	MG/L		0.01 U	
				99999	4-METHYL PHENOL	MG/L		0.0017 M	
				99999	BENZOIC ACID	MG/L		0.140	
				99999	4-CHLOROANILINE	MG/L		0.01 U	
				99999	ANILINE	MG/L		0.01 U	
				99999	2-METHYLNAPHTHALENE	MG/L		0.01 U	
				99999	2,4,5-TRICHLOROPHENOL	MG/L		0.05 U	
				99999	2-NITROANILINE	MG/L		0.05 U	
				99999	3-NITROANILINE	MG/L		0.05 U	
				99999	DIBENZOFURAN	MG/L		0.01 U	
				99999	4-NITROANILINE	MG/L		0.05 U	
				99920	CORROSIVITY	PH	TOTAL	5.22	
				99900	SILVER	MG/L		0.01 U	
				99901	ARSENIC	MG/L		0.2 U	
				99902	BARIUM	MG/L		0.2 U	
				99903	CADMIUM	MG/L		0.19	
				99904	CHROMIUM	MG/L		0.01 U	
				99905	MERCURY	MG/L		0.0002 U	
				99906	LEAD	MG/L		0.02 U	
				99907	SELENIUM	MG/L		0.1 U	QR
NE	91/01/16	1650							
PTH: 0000 SUBSTRATE: AQUEOUS									
SCRIPTION: TRIP BLANK									
			099588	34418	METHYL CHLORIDE	UG/L	TOTAL	10 U	
				34413	METHYL BROMIDE	UG/L	TOTAL	10 U	
				39175	VINYL CHLORIDE	UG/L	TOTAL	10 U	
				34311	CHLOROETHANE	UG/L	TOTAL	10 U	
				34423	METHYLENE CHLORIDE	UG/L	TOTAL	10 U	
				99930	ACETONE	UG/L	TOTAL	10 U	
				99964	CARBON DISULFIDE	UG/L	TOTAL	10 U	
				34501	1,1-DICHLOROETHYLENE	UG/L	TOTAL	10 U	
				34496	1,1-DICHLOROETHANE	UG/L	TOTAL	10 U	

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099588	34546	1,2-TRANS DICHLOROETHYLENE	UG/L	TOTAL	10	U
				32106	CHLOROFORM	UG/L	TOTAL	10	U
				32103	1,2-DICHLOROETHANE	UG/L	TOTAL	10	U
				99999	2-BUTANONE	UG/L	TOTAL	4.4	U
				34506	1,1,1-TRICHLOROETHANE	UG/L	TOTAL	10	U
				32102	CARBON TETRACHLORIDE	UG/L	TOTAL	10	U
				99999	VINYL ACETATE	UG/L	TOTAL	10	U
				32101	DICHLOROBROMOMETHANE	UG/L	TOTAL	10	U
				34541	1,2-DICHLOROPROPANE	UG/L	TOTAL	10	U
				34561	1,3-DICHLOROPROPYLENE	UG/L	TOTAL	10	U
				39180	TRICHLOROETHYLENE	UG/L	TOTAL	10	U
				32105	CHLORODIBROMOMETHANE	UG/L	TOTAL	10	U
				34511	1,1,2-TRICHLOROETHANE	UG/L	TOTAL	10	U
				34030	BENZENE	UG/L	TOTAL	10	U
				99999	CIS-1,3-DICHLOROPROPENE	UG/L	TOTAL	10	U
				32104	BROMOFORM	UG/L	TOTAL	10	U
				99999	4-METHYL-2-PENTANONE	UG/L	TOTAL	10	U
				34475	TETRACHLOROETHYLENE	UG/L	TOTAL	10	U
				34516	1,1,2,2-TETRACHLOROETHANE	UG/L	TOTAL	10	U
				99999	2-HEXANONE	UG/L	TOTAL	10	U
				34010	TOLUENE	UG/L	TOTAL	10	U
				34301	CHLOROBENZENE	UG/L	TOTAL	10	U
				34371	ETHYLBENZENE	UG/L	TOTAL	10	U
				99921	STYRENE	UG/L	TOTAL	10	U
				99920	XYLENES (TOTAL)	UG/L	TOTAL	10	U
	91/01/17	0928							
I: 0000	SUBSTRATE: AQUEOUS								
IPTION:	FIELD BLANK								
			099589	34418	METHYL CHLORIDE	UG/L	TOTAL	10	U
				34413	METHYL BROMIDE	UG/L	TOTAL	10	U
				39175	VINYL CHLORIDE	UG/L	TOTAL	10	U
				34311	CHLOROETHANE	UG/L	TOTAL	10	U
				34423	METHYLENE CHLORIDE	UG/L	TOTAL	10	U
				99930	ACETONE	UG/L	TOTAL	10	U
				99964	CARBON DISULFIDE	UG/L	TOTAL	10	U
				34501	1,1-DICHLOROETHYLENE	UG/L	TOTAL	10	U
				34496	1,1-DICHLOROETHANE	UG/L	TOTAL	10	U
				34546	1,2-TRANS DICHLOROETHYLENE	UG/L	TOTAL	10	U
				32106	CHLOROFORM	UG/L	TOTAL	10	U

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

ON NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099589	32103	1,2-DICHLOROETHANE	UG/L	TOTAL	10 U	
				99999	2-BUTANONE	UG/L	TOTAL	10 U	
				34506	1,1,1-TRICHLOROETHANE	UG/L	TOTAL	10 U	
				32102	CARBON TETRACHLORIDE	UG/L	TOTAL	10 U	
				99999	VINYL ACETATE	UG/L	TOTAL	10 U	
				32101	DICHLOROBROMOMETHANE	UG/L	TOTAL	10 U	
				34541	1,2-DICHLOROPROPANE	UG/L	TOTAL	10 U	
				34561	1,3-DICHLOROPROPYLENE	UG/L	TOTAL	10 U	
				39180	TRICHLOROETHYLENE	UG/L	TOTAL	10 U	
				32105	CHLORODIBROMOMETHANE	UG/L	TOTAL	10 U	
				34511	1,1,2-TRICHLOROETHANE	UG/L	TOTAL	10 U	
				34030	BENZENE	UG/L	TOTAL	10 U	
				99999	CIS-1,3-DICHLOROPROPENE	UG/L	TOTAL	10 U	
				32104	BROMOFORM	UG/L	TOTAL	10 U	
				99999	4-METHYL-2-PENTANONE	UG/L	TOTAL	10 U	
				34475	TETRACHLOROETHYLENE	UG/L	TOTAL	10 U	
				34516	1,1,2,2-TETRACHLOROETHANE	UG/L	TOTAL	10 U	
				99999	2-HEXANONE	UG/L	TOTAL	10 U	
				34010	TOLUENE	UG/L	TOTAL	10 U	
				34301	CHLOROBENZENE	UG/L	TOTAL	10 U	
				34371	ETHYLBENZENE	UG/L	TOTAL	10 U	
				99921	STYRENE	UG/L	TOTAL	10 U	
				99920	XYLENES (TOTAL)	UG/L	TOTAL	10 U	
				34586	2-CHLOROPHENOL	UG/L	TOTAL	10 U	
				34591	2-NITROPHENOL	UG/L	TOTAL	10 U	
				34694	PHENOL	UG/L	TOTAL	10 U	
				34606	2,4-DIMETHYLPHENOL	UG/L	TOTAL	10 U	
				34601	2,4-DICHLOROPHENOL	UG/L	TOTAL	10 U	
				34621	2,4,6-TRICHLOROPHENOL	UG/L	TOTAL	10 U	
				34452	P-CHLORO-M-CRESOL	UG/L	TOTAL	10 U	
				34616	2,4-DINITROPHENOL	UG/L	TOTAL	50 U	
				34657	4,6-DINITRO-O-CRESOL	UG/L	TOTAL	50 U	
				39032	PENTACHLOROPHENOL	UG/L	TOTAL	50 U	
				34646	4-NITROPHENOL	UG/L	TOTAL	50 U	
				34566	1,3-DICHLOROBENZENE	UG/L	TOTAL	10 U	
				34571	1,4-DICHLOROBENZENE	UG/L	TOTAL	10 U	
				34536	1,2-DICHLOROBENZENE	UG/L	TOTAL	10 U	
				34396	HEXACHLOROETHANE	UG/L	TOTAL	10 U	
				39702	HEXACHLOROBUTADIENE	UG/L	TOTAL	10 U	
				34551	1,2,4-TRICHLOROBENZENE	UG/L	TOTAL	10 U	
				34696	NAPHTHALENE	UG/L	TOTAL	10 U	

NGI 2.2059

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

OJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

T NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099589	34273	BIS(2-CHLOROETHYL) ET.	UG/L	TOTAL	10	U
				34278	BIS(2-CHLOROETHOXY) METH.	UG/L	TOTAL	10	U
				34408	ISOPHORONE	UG/L	TOTAL	10	U
				34447	NITROBENZENE	UG/L	TOTAL	10	U
				34428	N-NITROSODI-N-PROPYLAMINE	UG/L	TOTAL	10	U
				34433	N-NITROSODIPHENYLAMINE	UG/L	TOTAL	10	U
				34283	BIS(2-CHLOROISOPROPYL) ET.	UG/L	TOTAL	10	U
				34386	HEXACHLOROCYCLOPENTADIENE	UG/L	TOTAL	10	U
				34581	2-CHLORONAPHTHALENE	UG/L	TOTAL	10	U
				34200	ACENAPHTHYLENE	UG/L	TOTAL	10	U
				34205	ACENAPHTHENE	UG/L	TOTAL	10	U
				34381	FLUORENE	UG/L	TOTAL	10	U
				39700	HEXACHLOROBENZENE	UG/L	TOTAL	10	U
				34636	4-BROMOPHENYL PHENYL ET.	UG/L	TOTAL	10	U
				34461	PHENANTHRENE	UG/L	TOTAL	10	U
				34220	ANTHRACENE	UG/L	TOTAL	10	U
				34341	DIMETHYL PHTHALATE	UG/L	TOTAL	10	U
				34336	DIETHYL PHTHALATE	UG/L	TOTAL	10	U
				39110	DI-N-BUTYLPPHTHALATE	UG/L	TOTAL	10	U
				34292	BUTYL BENZYL PHTHALATE	UG/L	TOTAL	10	U
				34596	DI-N-OCTYL PHTHALATE	UG/L	TOTAL	10	U
				39100	BIS(2-ETHYLHEXYL) PHTHAL.	UG/L	TOTAL	10	U
				34376	FLUORANTHENE	UG/L	TOTAL	10	U
				34469	PYRENE	UG/L	TOTAL	10	U
				34320	CHRYSENE	UG/L	TOTAL	10	U
				34526	1,2-BENZANTHRACENE	UG/L	TOTAL	10	U
				34641	4-CHLOROPHENYL PHENYL ET.	UG/L	TOTAL	10	U
				34403	INDENO(1,2,3-C,D) PYRENE	UG/L	TOTAL	10	U
				34247	BENZO(A)PYRENE	UG/L	TOTAL	10	U
				34521	1,12-BENZOPERYLENE	UG/L	TOTAL	• 10	U
				34556	1,2:5,6-DIBENZANTHRACENE	UG/L	TOTAL	10	U
				34631	3,3'-DICHLOROBENZIDENE	UG/L	TOTAL	10	U
				34626	2,6-DINITROTOLUENE	UG/L	TOTAL	10	U
				34611	2,4-DINITROTOLUENE	UG/L	TOTAL	10	U
				34346	1,2-DIPHENYLHYDRAZINE	UG/L	TOTAL	10	U
				34230	3,4-BENZOFLUORANTHENE	UG/L	TOTAL	10	U
				34242	11,12-BENZOFLUORANTHENE	UG/L	TOTAL	10	U
				99999	BENZYL ALCOHOL	UG/L	TOTAL	10	U
				99999	2-METHYL PHENOL	UG/L	TOTAL	10	U
				99999	4-METHYL PHENOL	UG/L	TOTAL	10	U
				99999	BENZOIC ACID	UG/L	TOTAL	10	U

NGI 2-2060

COMPLETED ANALYSIS REPORT

REPORT DATE: 91/04/09

PROJECT NO: 979

PROJECT NAME: NELSON GALVANIZING

TION NO	DATE FROM TO	TIME OF DAY	LABNO	PARNO	PARAMETER NAME	UNITS	CHEMISTRY	VALUE & REMARK	QA/QC REMARK
			099589	99999	4-CHLOROANILINE	UG/L	TOTAL	10	U
				99999	ANILINE	UG/L	TOTAL	10	U
				99999	2-METHYLNAPHTHALENE	UG/L	TOTAL	10	U
				88894	2,4,5-TRICHLOROPHENOL	UG/L	TOTAL	50	U
				99999	2-NITROANILINE	UG/L	TOTAL	50	U
				99999	3-NITROANILINE	UG/L	TOTAL	50	U
				99999	DIBENZOFURAN	UG/L	TOTAL	10	U
				99999	4-NITROANILINE	UG/L	TOTAL	50	U
				01077	SILVER	UG/L	TOTAL	10	U
				01105	ALUMINUM	UG/L	TOTAL	200	U
				01002	ARSENIC	UG/L	TOTAL	10	U
				01007	BARIUM	UG/L	TOTAL	200	U
				01012	BERYLLIUM	UG/L	TOTAL	5	U
				00916	CALCIUM	MG/L	TOTAL	5	U
				01027	CADMIUM	UG/L	TOTAL	10	U
				01037	COBALT	UG/L	TOTAL	50	U
				01034	CHROMIUM	UG/L	TOTAL	10	U
				01042	COPPER	UG/L	TOTAL	25	U
				01045	IRON	UG/L	TOTAL	140	
				71900	MERCURY	UG/L	TOTAL	0.2	U
				00937	POTASSIUM	MG/L	TOTAL	5	U
				00927	MAGNESIUM	MG/L	TOTAL	5	U
				01055	MANGANESE	UG/L	TOTAL	15	U
				00929	SODIUM	MG/L	TOTAL	5	U
				01067	NICKEL	UG/L	TOTAL	40	U
				01051	LEAD	UG/L	TOTAL	20	U
				01097	ANTIMONY	UG/L	TOTAL	60	U
				01147	SELENIUM	UG/L	TOTAL	5	U
				01059	THALLIUM	UG/L	TOTAL	10	U
				01087	VANADIUM	UG/L	TOTAL	50	U
				01092	ZINC	UG/L	TOTAL	27	

***** END OF PROJECT *****

Nelson Galvanizing, Inc.
Enforcement Sampling QA Project Plan

Responsible Agency: U.S. Environmental Protection Agency
Surveillance and Monitoring Branch

Requesting Agency: U.S. Environmental Protection Agency
Hazardous Waste Compliance Branch

Project Officer: David J. Dugan 12/11/90
David Dugan, Environmental Scientist
Source Monitoring Section

Quality Assurance Officer: 12/11/90
Leon Lazarus, Environmental Scientist
Monitoring Management Branch

Laboratory Coordinator: John Birri 12/11/90
John Birri, Chief
Sanitary Chemistry/Microbiology Section
Technical Support Branch

1. **Project Name**: Nelson Galvanizing, Inc. Enforcement Sampling Inspection

2. **Project Requested By**: George Meyer, Chief
   Hazardous Waste Compliance Branch

3. **Date of Request**: December 10, 1990

4. **Date of Project Initiation**: December 10, 1990

5. **Project Officer**: David Dugan, Environmental Scientist
   Source Monitoring Section

6. **Quality Assurance Officer**: Leon Lazarus, Environmental Scientist, Monitoring Management Branch

7. **Project Description**:

   a. Background of the Facility: Nelson Galvanizing, Inc. (still operating) is located at 11-02 Broadway, in Long Island City, New York. The galvanizing process consists of acid treating bare metal parts to about 800°F. After the acid treatment, the metal parts are hung on steel wires and dipped into a brick tank of molten zinc. The zinc metal becomes plated to the underlying metal part and forms a protective coating on the part. Larger metal parts that cannot be hung from wires are dipped into the zinc tank while suspended on a chain from an overhead crane. The company was begun in the early 1840's, and was sold to the present owners in 1967.

   b. Objective and Scope of Work: A RCRA enforcement sampling inspection will be conducted by ESD staff on December 13, 1990. The purpose of the sampling inspection is to determine if any improper storage and/or disposal of hazardous wastes occurred at Nelson Galvanizing. The ESD field team will determine, by screening with pH paper, whether or not the waste acids stored on the facility fail to meet the characteristic of corrosivity, as stated in 40 CFR Part 261.22. If the waste acids have a pH of less than or equal to 2 or greater than or equal to 12.5, the material is considered a hazardous waste, and Nelson Galvanizing must meet and comply with the standards outlined in 40 CFR Part 262, Generators of Hazardous Waste. The results of the analysis of samples will be used for criminal enforcement purposes to conclude whether or not RCRA 40 CFR regulations have been violated. The Hazardous Waste Compliance Branch has requested the sampling of drums that have acids that indicate the characteristic of corrosivity, and will be analyzed for corrosivity.

8. **Schedule of Tasks and Products**:

Project Assigned:	December, 1990
Development of Site Safety Plan:	December, 1990
Development of Work Plan:	December, 1990
Site Safety Plan Submitted for Approval:	December, 1990
Work Plan Submitted for Approval:	December, 1990
Equipment Preparation:	December, 1990
Field Work:	December, 1990

9. **Project Organization and Responsibility**:

The following is a list of key project personnel and their corresponding responsibilities for samples analyzed at the EPA Edison Laboratory:

David Dugan.....Sampling Operations
John Ciancia.....Sampling QC
Jerry McKenna.....Laboratory Analyses
John Birri.....Laboratory QC
Chris Cornell.....Data Processing
John Birri.....Data Processing QC
John Birri.....Data Quality Review
Leon Lazarus.....Systems Auditing
Jerry McKenna.....Overall QA
David Dugan.....Overall Project Coordinator

10. **Data Quality Requirements**: The data must, at a minimum, conform to the QA/QC Implementation Plan dated February 17, 1987 as prepared by the Technical Support Branch for samples analyzed by the EPA Edison Laboratory.

Sample Representativeness: Sample containers, sampling equipment, sample collection techniques, and chain of custody procedures will conform with standard EPA, Region II protocol.

All sample container glassware are precleaned, Eagle-Picher containers with Teflon lids or septums. There is a possibility of collecting hydrofluoric acid in the field. The sample will be collected in a pint-size plastic cube container.

Quality assurance documentation of sample container cleanliness will be provided by Eagle-Picher, if requested.

Samples will be collected in 8 oz. wide-mouth glass containers with Teflon caps.

A trip blank will not be taken because volatile organic analysis is of no interest in this case. An equipment blank will be taken of the drum thief or coliwasa.

11. Sampling Procedures: All drum samples will be collected as grab samples in accordance with the Edison SOP #004, Drum Sampling. If any deviations from established procedures are used, they will be documented in the field notebook and subsequent report.

12. Calibration Procedures and Preventative Maintenance:

    a. Field Equipment: Air monitoring equipment will be calibrated prior to the sampling survey.

    b. Laboratory Equipment: Laboratory instrumentation is calibrated to meet method specified tuning and/or calibration criteria and maintained in accordance with the manufacturer's specifications and procedures.

13. Documentation, Data Reduction and Reporting:

    a. Documentation: All written notes will be recorded in a bound, field notebook. Chain of custody forms, sample labels, field data sheets, and analysis request sheets will be prepared by field personnel and given to the laboratory with the samples. The Surveillance and Monitoring Branch will retain all field notes and photographs. The Technical Support Branch will enter data into the LDMS at OSCAR and maintain QA/QC records.

    b. Data Reduction and Reporting: Data will be reported by the EPA lab in STORET/LDMS designated units. Sample results will be converted by Surveillance and Monitoring personnel to meet the requirements of the project initiators.

14. Data Validation: Data will be validated by the procedures outlined in the QC Data Summary Checklists and the QA/QC Implementation Plan dated February 17, 1987 as prepared by the Technical Support Branch.

15. Performance and Systems Audits: System audits are conducted on a continual basis at the EPA Edison Laboratory.

16. Corrective Action: Appropriate methods are followed to detect and correct problems, e.g., audits and field blanks.

17. Reports: Once QA/QC validated data is received from the ESD laboratory, a written report will be drafted for review, and finalized for signature within 30 working days. Upon receipt of approvals, it will be sent to the HWCB.

PARAMETER TABLE - NELSON GALVANIZING

Parameter	Number of Samples*	Sample Matrix	Analytical Method**	Preservation	Holding Time
Corrosivity	10-12	Liquid	C24	Cool to 4 °C	

* This number does not include trip and/or field blanks.

Duplicates will be collected at the frequency of a minimum of one in twenty samples.

** Samples to be analyzed according to Appendix I, Edison Laboratory Standard Operating Procedures (SOP).

Liquid samples that will be analyzed for corrosivity will be collected in 8 oz. wide mouth glass jars with Teflon caps. One exception is if the field team collects a sample(s) of hydrofluoric acid. In this case, the sample will be collected in a pint-size plastic cube container.

TCLP
ANALYTICAL DATA REPORT

WORK ORDER #

E109719

prepared for

METCALF & EDDY
303 SOUTH BROADWAY
TARRYTOWN, N.Y. 10591

PROJ: 6642-0001 NELSON GALV.

Date Received: 09/25/91

Prepared by

LABORATORY RESOURCES, INC.

T. F. McCommas 9/30/91

T.F. McCommas, Director Date
Robert LaFerriere, Tech. Lab. Director

NGI 2.2068

LABORATORY RESOURCES, INC.

EASTERN SCIENTIFIC DIVISION
RTE 205 THE REGIONAL BLDG.
P.O. BOX 700
BROOKLYN, CT 06234
TEL.-(203)774-6814 FAX-(203)774-2689

Report to:
METCALF & EDDY
303 SOUTH BROADWAY
TARRYTOWN, N.Y. 10591

Work ID: PROJ: 6642-0001 NELSON GALV.
Work Order #: E109719

Date Received: 09/25/91

PO Number:

Analysis Performed	Results	Detection Limits	Date of Analysis	Method of Analysis
Sample ID: DRUMS		Date Collected: 09/24/91		
pH - SOLIDS (units)	5.0		09/27/91	EPA 9045

All measurements are in mg/l unless otherwise specified
ND = None Detected/Below stated detection limit

Report is an accurate analysis of sample received at this laboratory.

T.F. McCommas, Director Date
Robert LaFerriere, Tech. Lab. Director
CT Laboratory PH 0465

ANALYTICAL RESULTS
TOXICITY CHARACTERISTICS LEACHING PROCEDURE

LAB ID: E109719-01
CLIENT ID: DRUMS
CLIENT: METCALF & EDDY

PARAMETER	METHOD	DATE OF ANALYSIS	UNADJUSTED RESULT (mg/L)	ADJUSTED RESULT (mg/L)	PQL (mg/L)	REGULA LEVE (mg/
TCLP METALS EXTRACTION	1311	09/26/91				
ARSENIC	6010	09/27/91	1.7	2.1	0.2	5.
BARIUM	6010	09/27/91	0.080	0.090	0.005	100.
CADMIUM	6010	09/27/91	0.700	0.970	0.005	1.
CHROMIUM	6010	09/27/91	0.400	0.500	0.05	5.
LEAD	6010	09/27/91	1.50	2.10	0.05	5.
MERCURY	7470	09/27/91	ND	ND	0.0005	0.
SELENIUM	6010	09/27/91	2.0	2.2	0.2	1.
SILVER	6010	09/27/91	ND	ND	0.05	5.

METHOD REFERENCE: SW-846, 3rd EDITION.
PQL: PRACTICAL QUANTIFICATION LIMIT.
THE ADJUSTED RESULT ACCOUNTS FOR MATRIX SPIKE RECOVERIES PER 40 CFR, PART 261.
TCLP AND ZERO HEADSPACE EXTRACTION PERFORMED AS PRESCRIBED IN FEDERAL REGISTER 40 CFR PART 261, MARCH 29, 1990.

CONTACT 01

NGI 2.2070

M&E Metcalf & Eddy

CHAIN OF CUSTODY FORM

Job/Project Name: NELSON GALV. | Job/Project Location: LIC, NY | Job/Project Number: 6642 - 0001

Samplers: (Signatures) [signature] | Recorder: (Signature) [signature] | Date: 7.24.91

Lab (Samples Sent To): LABORATORY RESOURCES

SAMPLING Date	SAMPLING Time	SAMPLE NUMBER	SAMPLE LOCATION	MATRIX: Water	MATRIX: Soil				COMPOSITE/GRAB	PRESERVATIVE (Y/N)	ANALYSIS REQUESTED: METALS	P.H.						Total #	COMMENTS
7-24-91	14:00	1	DRUMS		X														TCLP

Relinquished By: (Signature)	Date:	Time:	Received By: (Signature)	Relinquished By: (Signature)	Date:	Time:	Received By: (Signature)
[signature]	7-24-91	15:00					

Relinquished By: (Signature)	Date:	Time:	Received for Lab By: (Signature)	Date:	Time:	Comments:
			[signature]	9/25/91	1300	TCLP FOR METALS / PH

Method of Shipment:

Distribution: Original to Lab, Copy 1 to Field Files, Copy 2 to Project Manager

ATTN: BILL [illegible]

Form 274 (Rev. 5/90)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY NGI 2.2071
REGION II

DATE: OCT 08 1991

SUBJECT: Nelson Galvanizing-Results of Ferrous Sulfate Salts Sampling

FROM: Paul L. Kahn, On-Scene Coordinator
Preparedness Section
Response and Prevention Branch

TO: Anne Kelly, Geologist
New York Compliance Section
Hazardous Waste Compliance Branch

On 9/24/91 myself and Tom Porteus of Metcalf & Eddy took samples from each of 14 55-gallon drums of ferrous sulfate salts that were shoveled from the floor at the above facility.

The individual samples were mixed thoroughly and a composite sample of approx. 500 grams was sent to a laboratory for TCLP analysis for metals and pH. The results of the analysis are attached, and show that the pH was 5 and the concentration of lead and **selenium** was 2.1 and **2.2** parts per million respectively. On 10/8/91 I advised Metcalf & Eddy that the analysis shows this material to be hazardous for selenium. Metcalf & Eddy will contact the laboratory and have the data and analysis rechecked to confirm the results. Unless the laboratory issues a revised certified report based on an error in data reporting, I will notify Nelson Galvanizing that these 14 drums of salts will have to be shipped for disposal as hazardous waste, in a permitted RCRA disposal facility that is currently in compliance with its RCRA permit. This analysis is being provided to you for information purposes only at this time. I will send you copies of all future correspondence regarding the disposition of the contents of the 14 drums of salts.

cc: M. Mintzer, 2ORC

NGI 2.2072

TCLP
ANALYTICAL DATA REPORT

WORK ORDER #

E109719

prepared for

METCALF & EDDY
303 SOUTH BROADWAY
TARRYTOWN, N.Y. 10591

PROJ: 6642-0001 NELSON GALV.

Date Received: 09/25/91

Prepared by

LABORATORY RESOURCES, INC.

T. F. McCommas 9/30/91

T.F. McCommas, Director Date
Robert LaFerriere, Tech. Lab. Director

LABORATORY RESOURCES, INC.

EASTERN SCIENTIFIC DIVISION
RTE 205 THE REGIONAL BLDG.
P.O. BOX 700
BROOKLYN, CT 06234
TEL.-(203)774-6814 FAX-(203)774-2689

Report to:
METCALF & EDDY
303 SOUTH BROADWAY
TARRYTOWN, N.Y. 10591

Work ID: PROJ: 6642-0001 NELSON GALV.
Work Order #: E109719

Date Received: 09/25/91

PO Number:

Analysis Performed	Results	Detection Limits	Date of Analysis	Method of Analysis
Sample ID: DRUMS			Date Collected: 09/24/91	
pH - SOLIDS (units)	5.0		09/27/91	EPA 9045

All measurements are in mg/l unless otherwise specified
ND = None Detected/Below stated detection limit

Report is an accurate analysis of sample received at this laboratory.

T.F. McCommas, Director Date
Robert LaFerriere, Tech. Lab. Director
CT Laboratory PH 0465

NGI 2.2074

ANALYTICAL RESULTS
TOXICITY CHARACTERISTICS LEACHING PROCEDURE

LAB ID: E109719-01
CLIENT ID: DRUMS
CLIENT: METCALF & EDDY

PARAMETER	METHOD	DATE OF ANALYSIS	UNADJUSTED RESULT (mg/L)	ADJUSTED RESULT (mg/L)	PQL (mg/L)	REGULA LEVE (mg/
TCLP METALS EXTRACTION	1311	09/26/91				
ARSENIC	6010	09/27/91	1.7	2.1	0.2	5.(
BARIUM	6010	09/27/91	0.080	0.090	0.005	100.(
CADMIUM	6010	09/27/91	0.700	0.970	0.005	1.(
CHROMIUM	6010	09/27/91	0.400	0.500	0.05	5.(
LEAD	6010	09/27/91	1.50	2.10	0.05	5.(
MERCURY	7470	09/27/91	ND	ND	0.0005	0.
SELENIUM	6010	09/27/91	2.0	2.2	0.2	1.
SILVER	6010	09/27/91	ND	ND	0.05	5.

METHOD REFERENCE: SW-846, 3rd EDITION.
PQL: PRACTICAL QUANTIFICATION LIMIT.
THE ADJUSTED RESULT ACCOUNTS FOR MATRIX SPIKE RECOVERIES PER 40 CFR, PART 261.
TCLP AND ZERO HEADSPACE EXTRACTION PERFORMED AS PRESCRIBED IN FEDERAL REGISTER 40 CFR PART 261, MARCH 29, 1990.

CONTA[illegible] 01

M&E Metcalf & Eddy

CHAIN OF CUSTODY FORM

Job/Project Name: NELSON GALV.	Job/Project Location: LIC, NY	Job/Project Number: 6642 - 0001
Samplers: (Signatures) [signature]	Recorder: (Signature) [signature]	Date: 7-24-91
Lab (Samples Sent To): LABORATORY RESOURCES		

Sampling Date	Sampling Time	Sample Number	Sample Location	Matrix: Water	Matrix: Soil				Composite/Grab	Preservative (Y/N)	Analysis Requested: METALS	P.H.						Total #	Comments
7-24-91	14:00	1	DRUMS		X														TCLP

Relinquished By: (Signature)	Date:	Time:	Received By: (Signature)	Relinquished By: (Signature)	Date:	Time:	Received By: (Signature)
[signature]	7-24-91	15:00					

Relinquished By: (Signature)	Date:	Time:	Received for Lab By: (Signature)	Date:	Time:	Comments:
			[signature]	9/25/91	1300	TCLP FOR METALS / PH ATTN: BILL BE[illegible]

Method of Shipment:

Distribution: **Original** to Lab. **Copy 1** to Field Files. **Copy 2** to Project Manager

Form 274 (Rev. 5/89)

NGI 2.2075

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: JAN 30 1991

SUBJECT: Request for Removal Action at Nelson Galvanizing Site, Long Island City, Queens County, New York - ACTION MEMORANDUM

FROM: Paul L. Kahn, On-Scene Coordinator
Response and Prevention Branch

TO: Constantine Sidamon-Eristoff
Regional Administrator

THRU: Richard L. Caspe, P.E., Director
Emergency and Remedial Response Division

Site ID No.: 6Z

I. PURPOSE

This request is being made for the approval of funds to conduct a time critical removal action at the subject site, located at 11-02 Broadway, Long Island City, New York. This request is based upon discussions with the New York State Department of Environmental Conservation (NYSDEC), the New york City Department of Environmental Protection (NYCDEP) and the U. S. Environmental Protection Agency (EPA) Region II, in which the NYSDEC agreed that EPA will conduct a removal of hazardous substances, pollutants and contaminants at Nelson Galvanizing Inc. (NGI). This site is not on the National Priorities List (NPL). To the best of the On-Scene Coordinator's (OSC) knowledge there are no nationally significant or precedent-setting issues associated with this removal.

II. SITE CONDITIONS AND BACKGROUND

A. The NGI site consists of one two story building located in an area of mixed land use: commercial, residential and light industrial. The building is constructed of steel beams, covered with corrugated sheet metal, and is about 60 feet high. A commercial car leasing business is adjacent to NGI; both businesses share a common interior wall. There has been an industrial business on the site since about 1849; the previous business was a steel fabricating shop. The current operator, NGI, has been operating the galvanizing business since approximately 1967, and is currently still operating but at a significantly lower level of production.

In October 1990, the New York City Department of Environmental Protection (NYCDEP) requested that EPA Region II accompany its Haz-Mat inspectors on an inspection of the premises of NGI. Two joint EPA-NYCDEP inspections, November 19, 1990 and November 29, 1990, and one EPA inspection on December 13, 1990, revealed that NGI is storing in excess of one hundred drums of spent (used) acids and caustic inside the premises. These drums, many of which are open-top, are stacked four or five rows high without pallets between the rows. The EPA inspection on December 13, 1990 revealed that open drums of acid with a pH values of 0, and less than 2 are being stored on site. Standing liquids on the floor were also tested and were shown to have a pH of 2. In addition to the drummed acids and caustic, there are five large dipping tanks on-site, three tanks each holding approximately 4,000 gals. of 5% sulfuric acid, one tank of sodium hydroxide with approximately 2,500 gallons, and one tank of zinc ammonium chloride holding approximately 1,500 gallons. In addition, it was observed that the business operates on a dirt floor; only the entrance way and approximately 70 feet into the premises is covered with concrete. Consequently, it is believed that over the previous 23 years of operation the soil has become stained and saturated from numerous chemical spills and leaks. An officer of the business, Mr. John Sweeney, stated that he used to neutralize his waste acids on-site and discharge the material directly into the city sewer system. In 1988, the NYCDEP ordered this practice stopped and required off-site disposal. NGI has overtly ceased the formal practice of on-site neutralization, but is believed to be disposing waste chemicals via dumping into an excavated dirt trench inside the premises, allowing the chemicals to drain-off into the outside soil. The local utility, Consolidated Edison, has an electrical conduit running under the street adjacent to NGI. Periodically, Con-Ed hires a clean-up contractor to pump accumulated acidic waste water (pH 2 - 4) from its conduit, sometimes as much as 6,000 gallons at a time. Con-Ed has con- tended that the waste water emanates from NGI, and indeed had made the initial complaint to the NYCDEP that resulted in the ban on discharging the neutralized NGI wastes. The fact that there are no other businesses in the immediate area of NGI that use acids or caustic only serves to support Con Ed's contention.

A preliminary assessment was conducted by the OSC during each inspection. In addition to the drums of waste acids and caustic, the OSC observed approximately 30 drums of contaminated soils that we have been informed had been excavated by NGI from an area just outside of the premises. This had been done in response to an NYCDEP clean-up order issued in 1988. There are tons of scrap metal lying about, and leaking tanks of acid and caustic. There

is a small package boiler being used by NGI that was in extremely poor physical condition, to the point that the OSC believed that a boiler explosion was imminent [NOTE: subsequent to the November 19, 1990 preliminary assessment the NYCDEP shut down the boiler pending emergency repair and overhaul; repairs were completed on November 29, 1990 and the boiler placed back into service].

A. Site Description

1. Removal Site Evaluation

The galvanizing process at this site involves the precleaning of base metal in either sulfuric acid or sodium hydroxide to remove dirt, rust and other surface contamination. The pre-cleaned metal is dipped into zinc ammonium chloride, which acts as a surface conditioner. The parts are then dipped into a tank of molten zinc (temperature approx. 800° F). After immersion in the molten zinc for about one minute the parts are removed and allowed to cool, completing the process. NGI is a job-shop business, i.e., it does not have a dedicated production line, but instead processes parts made by others on a piece-work basis. Preliminary evaluations at the site revealed that perhaps as much as 10,000 to 15,000 gallons of bulked acids and caustic are being stored in leaking and corroded containers, stacked in a haphazard and precarious fashion.

2. Physical Location

NGI is located in Long Island City, Queens, in an area of mixed land use. There are single family houses in the immediate area, intermixed with commercial businesses as well as light manufacturing. Several thousand residents and individuals live and work within 1/2 mile of NGI. There is public housing for perhaps 5,000 to 8,000 people within 1/2 mile of the facility. The site is within 1/2 mile of the Northern tip of Roosevelt Island, home to perhaps 12,000 people. The site is located within 3 blocks of the East River, which although not a source of drinking water, is a major ship, barge and recreational waterway.

3. Site Characteristics

This site is an operating metal galvanizing facility. In the course of its operations, NGI utilizes acids, caustic, a zinc salt, zinc metal, and a fluoride-based zinc flux. This will be the first federal removal action ever conducted at this site.

4. Release or Threatened Release into the Environment

Based on the three EPA inspections of the site, the hazardous substances present are sulfuric acid, sodium hydroxide, zinc ammonium chloride, and zinc metal. There are perhaps 150 drums of spent acid and caustic that are piled on each other at precarious angles. Many drums are open-top and liquids were observed to be spilling or leaking from these drums. Because there is a dirt floor inside the premises, many drums are partially buried and wet stains were observed in the soil surrounding these drums. There are standing liquids that have been shown to have a pH of 2. Two drums of waste acid were tested and shown to have a pH of 0, and between 1 and 2. The OSC observed that some of the waste acid drums on the bottom of piles four and five levels high are being deformed by the successive weight of the drums on top. Some of these drums appear to be deformed so that their seams and edges may be stressed to the point of bursting.

The following hazardous substances have been tentatively identified at the site:

Substance	Statutory Source of Designation as a Hazardous Substance
Sulfuric acid	CWA Section 311(b)(4)
Hydrofluoric acid	CWA Section 311(b)(4) RCRA Section 3001
Sodium hydroxide	CWA Section 311(b)(4)
Zinc ammonium chloride	CWA Section 311(b)(4)
Zinc metal	CWA Section 307(a)

The potential health effects from the compounds are identified in the following chart:

	Toxic by Inhalation, Ingestion or Dermal Contact	Central Nervous System Effects	**Eye, Skin, Respiratory Effects or Mucous Membrane Irritant**
Sodium Hydroxide	X		X
Sulfuric acid			X
Zinc amm. chloride	X	X	X
Zinc			X
Hydrofluoric acid	X		X

5. NPL Status

The site is currently not listed on the National Priorities List.

B. Other Actions to Date

1. Previous Actions

At the direction of the NYCDEP, NGI had excavated some contaminated soil at the site; this dirt is currently being stored inside the NGI premises in metal bins. The NYCDEP had also directed NGI to conduct some groundwater sampling in 1988. Analysis of the soil samples revealed the presence of numerous metals such as lead and silver. The NYCDEP has issued an order to NGI to dispose of its waste materials; NGI has not fully complied with this order.

2. Current Actions

There are no other government or private removal actions currently being performed at this site.

C. State and Local Authorities' Roles

1. State and Local Actions to Date

The NYCDEP has issued an order to NGI with respect to cleaning up the site and/or disposing of waste materials. As of this date, NGI has only performed some excavation of contaminated soil, and performed ground water sampling. NYCDEP filed a complaint in January 1991 to enforce its Order.

2. Potential for Continued State/Local Response

The NYSDEC and the NYCDEP will act only in a support role throughout the duration of this removal. Subsequent to the removal action, NYCDEP has expressed its intent to assist in performing necessary actions to address subsurface contaminants.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health and Welfare

Hazardous substances, pollutants or contaminants presently stored in drums, open tanks and bins represent a threat to the public health and welfare as defined by §300.415(b) of the National Contingency Plan (NCP), in that there is an actual ongoing release and/or there is a high potential for such to occur. The substances, which include hydrofluoric and sulfuric acid, sodium hydroxide, and zinc, all represent a threat to the health and welfare of the community. These materials are considered to be highly corrosive in characteristic, by the Resource Conservation and Recovery Act (RCRA).

It is estimated that between 10,000 and 15,000 gallons of corrosive acids and caustic are being stored on-site in open-top drums and in large open-top tanks. In addition, there are tons of contaminated soils and debris being stored on the premises. There are standing puddles of acidic liquids throughout the facility which are believed to be leaking out of the facility into the environment. The site is located at the western edge of a densely populated residential community, and is located amongst numerous other commercial industries that employ many hundreds of workers. In the event of a fire, it is anticipated that firefighters would not be able to avoid contamination from acidic runoff and toxic fumes during firefighting efforts. All runoff produced by firefighting efforts would go directly into the storm sewer and thence directly to the East River. Drums of waste chemicals and piles of debris are stacked in front of access doors, which would severely hamper firefighting efforts in the event of a fire occurring on the premises. There is also a potential for direct contact exposure through acts of vandalism or from trespassers. Although the business is operated 24 hours a day, there is direct access to the hazardous chemicals via a number of doorways and holes in the sides of the building; interior lighting conditions are extremely poor. There are numerous holes and openings in the roof that allow rainwater to enter the premises, washing the spilled acids and caustic onto the dirt floor.

B. Threats to the Environment

There is a threat of release into the environment and therefore, this site does meet the criteria for such as described in §300.415(b)(2) of the NCP. There is obvious evidence of leakage of hazardous materials onto the dirt floor of the site. When standing puddles of liquids were tested with pH paper during EPA's preliminary assessments, the test paper indicated pH levels of 0, and less than 2, thereby meeting the corrosive characteristic as defined by RCRA. The OSC believes that much of this spilled acidic material is seeping from the facility into the environment. The water table in the area is approximately 8-10 feet below the surface of the ground.

C. Evidence of Extent of Release

Evidence of past spills and ongoing releases from deteriorated drums and dip tanks is evidenced by the stains, puddles, and corrosion throughout the facility. In 1988, the NYCDEP was obliged to undertake extensive repairs to the sidewalk and storm drains adjacent to the site, believed to be the result of acidic releases from the site undermining these structures.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this site, if not addressed by implementation of the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

Removal of hazardous substances, pollutants, and contaminants and off-site RCRA disposal is the only feasible solution for mitigating threats posed by the situation. Site stabilization without disposal would provide only a temporary solution to the threats posed by the site.

A. Proposed Actions

1. Proposed Action Description

Because of the proximity of hazardous substances to the business operations ongoing at the facility, the removal action will necessitate excluding the operator and requiring the cessation of business operations for a period of several months. Consensual access will be sought first. After access has been obtained

EPA would then activate its Emergency Response Cleanup Services contractor to initiate security patrols and to secure the building with door enclosures and proper locks. Due to the fact that there are tons of scrap metal and debris piled inside the building, it will be necessary to first move much of this material to determine whether there are drums containing hazardous substances lying underneath. Concurrent with this activity, a detailed inventory and waste profile of all materials and containers that are now visible, will be conducted, including any additional drums that may be uncovered as the debris is removed. Based on knowledge of the galvanizing process the hazardous waste streams are believed to be acids, caustics, elemental zinc, and a zinc salt (zinc ammonium chloride), an initial evaluation would also be made as to which chemicals might be recycled. Because the vast majority, if not all, of the materials are spent acids or caustic, it is unlikely that any of hazardous substances could be returned to their manufacturers. As the waste streams become fully documented, the acids and caustic would be staged, bulked, and shipped for disposal. It is possible that some of the acids could be neutralized on-site, and the resulting waste shipped to a wastewater treatment facility.

2. Contribution to Remedial Performance

The proposed action will, to the extent practicable, contribute to the efficient performance of any long-term remedial action, including any subsurface cleanup actions undertaken.

3. Description of Alternative Technologies

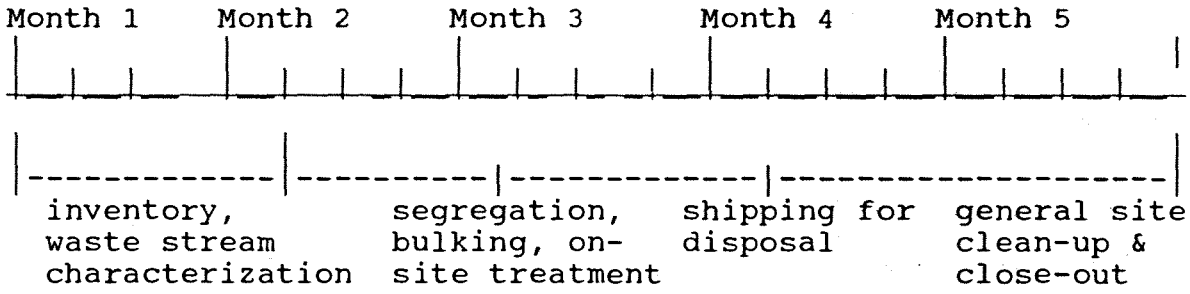
Recycling and both on- and off-site treatment are the primary disposal options. Recycling of liquid wastes is the least expensive option. Because most of the liquid wastes have no market value, or are so cross-contaminated that they have no recycle value, other disposal options would be pursued, such as off-site incineration or neutralization.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

ARARs within the scope of this project, including RCRA and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) regulations that pertain to the disposal of hazardous wastes, will be met to the extent practicable.

5. Project Schedule

Based on the documented amounts of material on the site, it is estimated that the removal action will require 5 months to complete. The timeline for the removal action is anticipated to be as follows:



B. **ESTIMATED COSTS** (rounded to nearest thousand)

1. **Extramural Costs:**	**Proposed Ceiling**
Regional allowance costs (Total cleanup contractor costs include labor, equipment, materials laboratory disposal analysis, transportation and disposal) includes 20% contingency.	$775,000
Other extramural costs not funded from the regional allowance:	
Total TAT, including multiplier costs	$ 70,000
Subtotal, Extramural costs	$845,000
Extramural costs contingency (20% of subtotal)	$169,000
TOTAL EXTRAMURAL COSTS	$1,014,000
2. **Intramural Costs:**	
Intramural direct costs	$30,000
Intramural indirect costs	$15,000
TOTAL INTRAMURAL COSTS	$45,000
3. **TOTAL REMOVAL PROJECT CEILING**	$1,059,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action will increase public health risks to the adjacent population through prolonged exposure to airborne contaminants in the event of a fire or vandalism.

VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues associated with this site.

VIII. ENFORCEMENT

Based on discussions with an officer of NGI, and NYCDEP staff, it is believed that neither facility owner or operators have sufficient financial resources to undertake this removal action. In addition they have demonstrated lack of cooperation with prior regulatory requirements. Although a PRP search is underway in an attempt to locate other sources of potential funding, due to the nature and amount of hazardous wastes at this site, a fund-lead time-critical removal action is necessary. At the present time, other EPA media offices, including RCRA, Title III, Section 313, and Air and Waste Management are investigating this site for possible violations of a number of EPA statutes.

Removal activities such as bulking and transferring hazardous substances, cannot be performed while NGI employees are present. Conversely, EPA and contractor personnel cannot perform their duties while NGI is operating overhead cranes and moving heavy sections of metal around, operating the galvanizing tanks, etc. Thus, an activity of this nature cannot be accomplished safely while NGI is still in operation. It is anticipated that EPA might not be granted consensual access to the site to conduct a removal action. EPA may seek access to the site through the federal courts.

IX. **RECOMMENDATION**

This decision document represents the selected removal action for the Nelson Galvanizing Inc. site, in Long Island City, New York. It was developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record and visual inspections of the site. Conditions at the Nelson Galvanizing Inc. site meet the criteria for a removal action pursuant to 40 CFR 300.415(b)(2) (NCP). The total project ceiling, if approved, will be $1,059,000. Of this, an estimated $775,000 comes from the Regional Removal Allowance, and is within the Regional Advice of Allowance for FY-91. It is therefore recommended that you approve this CERCLA removal funding request. Please indicate your approval and authorization of funding for the Nelson Galvanizing Inc. site, pursuant to your authority delegated by Assistant Administrator J. Winston Porter, May 25, 1988, Redelegation Memorandum, Delegation Number R-14-1-A.

Approval: _____ Date 1/30/91
Constantine Sidamon-Eristoff
Regional Administrator

Disapproval: _____ Date _____
Constantine Sidamon-Eristoff
Regional Administrator

cc: (after approval is obtained)
R. Caspe, 2ERRD
R. Salkie, 2ERR-ADREPP
B. Sprague, 2ERR-RPB
G. Zachos, 2ERR-RAB
G. Pavlou, 2ERR-DDNY/CP
V. Pitruzzello, 2ERR-PS
W. Mugdan, 2ORC
E. Schaaf, 2ORC
J. Marshall, 2OEP
R. Gherardi, 2OPM-FIN
S. Anderson, PM-214F (Express Mail)
S. Luftig, OS-210
T. Grier, OS-210
P. McKechnie, 2IG
T. Mignone, 2TATL
J. Rosianski, 2OEP
C. Moyik, 2ERR-PS

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

SEP 3 0 1999

SUBJECT: Request for a CERCLA Removal Action at the Nelson Galvanizing Site, Long Island City, Queens County, New York **ACTION MEMORANDUM**

FROM: Jeff M. Bechtel, On-Scene Coordinator
Response and Prevention Branch

TO: Richard L. Caspe, Director
Emergency and Remedial Response Division

Thru: Bruce Sprague, Chief
Response and Prevention Branch

Site ID No.: 6Z

I. PURPOSE

The purpose of this Action Memorandum is to request authorization to conduct a time-critical removal action described herein at the Nelson Galvanizing Site (Site), 11-02 Broadway, Long Island City, Queens County, New York.

On June 16, 1999, the Emergency and Remedial Response Division received a written request from the Division of Enforcement and Compliance Assistance (DECA) regarding hazardous materials at the Nelson Galvanizing Site, in Long Island City, New York asking that a removal action be considered for this Site.

On June 30, 1999, EPA conducted a removal assessment and determined that the Site met the criteria for the performance of a removal action under the provisions of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) as amended by 42 U.S.C. §§9601 et seq. The Site consists of an inactive galvanizing facility.

This Action Memorandum, if approved, will authorize a total project ceiling of $810,000, with a mitigation ceiling of $450,000. The funds are necessary to provide for site security, sampling, analysis, soil excavation and disposal of hazardous substances present at this Site.

This Site is not on the National Priorities List (NPL) and there are no nationally significant or precedent-setting issues associated with this Site.

II. SITE CONDITIONS AND BACKGROUND

A. Site Description

1. Removal Site Evaluation

The Site consists of one two-story building located in an area of mixed commercial, residential and light industry. The building is constructed of steel beams, covered with corrugated sheet metal, and is about 60 feet high. The facility is in disrepair, with walls and ceilings falling down. A commercial car leasing business is adjacent to the Site. Both businesses share a common interior wall. The facility has no security. There has been an industrial business on the Site since about 1849.

From 1967 until 1994, Nelson Galvanizing, Inc. ("NG") operated a galvanizing business at the facility. EPA believes that the facility is owned by Nelson Foundry, Inc. ("NF"). John Sweeney ("Sweeney") operated NG's business and is also believed by EPA to own both NG and NF.

The EPA removal assessment on June 30, 1999, revealed that there is stored at the Site in excess of one hundred 55-gallon drums of spent acids and caustic, along with approximately thirty smaller containers. These drums and containers, many of which are open-top, are stored without regard to compatibility. The inspection revealed that some drums of acid have a pH of less than two. In addition to the drummed acids and caustic, there are three large open-top tanks, one holding approximately 40 cubic yards of sulfuric acid sludge, one tank of sodium hydroxide with approximately 900 gallons of liquid and 1800 gallons of sludge, and one tank of zinc ammonium chloride holding approximately 900 gallons. In addition, it was observed that the business had operated on a dirt floor. Only the entrance way and approximately 70 feet into the premises is covered with concrete. Consequently, it is believed that over the years of operation, the soil has become stained and saturated from numerous chemical spills and leaks.

2. Physical Location

The Site is located in Long Island City, New York. There are single family houses in the immediate area, intermixed with commercial businesses, as well as light manufacturing. Several thousand residents and individuals live and work within ½ mile of the Site. There is public housing for approximately 8,000 people within ½ mile of the facility. The Site is within ½ mile of

the northern tip of Roosevelt Island, home to approximately 12,000 people. The Site is located within three blocks of the East River, which although not a source of drinking water, is a major ship, barge and recreational waterway.

3. Site Characteristics

A metal galvanizing facility was operated at the Site by NG from 1967 to 1994. The operation utilized, among other chemicals, acids, caustic, zinc salt, zinc metal, and fluoride-based zinc flux. This will be the second federal removal action to be conducted at this Site with the first being a responsible party cleanup under a consent order.

Within one-half mile of the Site are residential areas, light industry, commercial properties and major arterials.

4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

The following hazardous substances have been identified at the Site:

Substances Identified	Statutory Source for Designation as a Hazardous Substance
Sulfuric Acid	CWA Section 311(b)(4)
Hydrofluoric Acid	CWA Section 311(b)(4), CAA Section 112, RCRA Section 3001
Sodium Hydroxide	CWA Section 311(b)(4)
Zinc Ammonium Chloride	CWA Section 311(b)(4)
Zinc metal	CWA Section 307(a)

CWA: Clean Water Act CAA: Clean Air Act
RCRA: Resource Conservation and Recovery Act

These hazardous substances are acutely and chronically toxic and/or corrosive.

The potential health effects from these compounds are identified below:

Potential Health and Toxicological Effects

	Cardiovascular Damage	Respiratory Damage	Dermal Effects
Sulfuric Acid		X	X
Hydrofluoric Acid		X	X
Sodium Hydroxide		X	X
Zinc Ammonium Chloride	X	X	X
Zinc metal		X	X

The environmental effects posed by these materials include the contamination of the soil which has already been documented at the Site, and the potential for migration of the contamination into the East River.

The run-off from rain or firefighting efforts could act as a carrier to transport contaminants from the Site and into the soil, surface water and neighboring properties.

5. NPL Status

At the present time, the Site is not on the NPL and there are no efforts underway to include this Site on the NPL.

B. Other Actions to Date

1. Previous Actions

In March 1991, EPA issued an administrative order on consent (II-CERCLA-10206) ("ACO") to NG, NF and Sweeney, pursuant to which the respondents performed a removal action at the facility. The facility remained in operation while performing the removal action under EPA oversight.

Following the completion of the removal action, EPA Region 2 Division of Enforcement and Compliance Assistance ("DECA") determined that more wastes, including hazardous wastes, accumulated at this facility. In late 1994, EPA and Sweeney entered into a ("RCRA Order") consent order under RCRA requiring Sweeney to remove all solid and liquid wastes and raw materials that had accumulated since the conclusion of the CERCLA removal action. The RCRA Order required that work to be completed by 1995.

New York City Department of Environmental Protection ("NYCDEP")

Industrial Waste Unit ("IWU") conducted inspections of the facility between 1995 and 1996 and determined that the facility was inactive. NYCDEP issued an order requiring certain clean up of the facility. NYCDEP inspections determined that NG had shipped off some material and had dismantled a tank. Subsequently, NYCDEP issued a summons to Sweeney charging violations of NYC criminal law relating to the wastes at the Site.

Sweeney has claimed that neither he nor NG have the financial resources to clean up the wastes at the facility.

2. Current Actions

Since 1994, the facility has been closed and no galvanizing has occurred on this Site.

In June 1998, DECA inspected the facility and a sampling inspection was conducted in July 1998, which confirmed the presence of hazardous waste. A RCRA 3007 Information Request Letter was sent to NG on September 24, 1998 requiring a response within thirty day, but no response was received. DECA issued a Notice of Violation ("NOV") on November 6, 1998 which was not delivered because Sweeney refused to accept the letter of transmittal. On December 28, 1998 a second NOV was issued for the following violations: (1) failure to respond to an information request letter; and (2) failure to abide by the requirements of the 1994 RCRA Order. It too was not accepted and was returned to DECA. On December 30, 1998, another RCRA 3007 information request letter requesting information on a particular requirement of the RCRA Order was sent. This letter was also refused and returned. In January 1999, attempts to hand deliver all the above documents were again rebuffed by Sweeney.

In January 1999, EPA DECA again inspected the facility and determined that there were no apparent changes since July 1998.

C. State and Local Authorities' Roles

1. State and Local Actions to Date

New York City Department of Environmental Protection ("NYCDEP") Industrial Waste Unit ("IWU") conducted inspections of the facility between 1995 and 1996 and determined that the facility was inactive. NYCDEP issued an order requiring certain clean up of the facility. NYCDEP inspections determined that NG had shipped off some material and had dismantled a tank. Subsequently, NYCDEP issued a summons to Sweeney charging violations of NYC criminal law relating to the wastes at the Site.

2. Potential for Continued State/Local Response

Neither the NYSDEC, NYCDEP, nor the local government have the resources available to do the necessary removal action at the Site. These organizations will act in a supporting role throughout the removal action.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

The release and threat of further release of hazardous substances present at the Site represent a threat to the public health and welfare as defined by Section 300.415(b)(2) of the National Contingency Plan (NCP), in that there is a high potential for releases to occur resulting in actual or potential exposure to nearby human populations; there are hazardous substances in drums and other containers that may pose a threat of release; there may be high levels of hazardous substances in soils at the Site largely at or near the surface, that may migrate; and the hazardous substances at the facility stored without regard to compatibility may present a threat of fire or explosion. Hazardous substances include substances specifically listed at Table 302.4 of the NCP and other wastes which, due to characteristics of toxicity or corrosivity are also hazardous substances. These include hydrofluoric and sulfuric acid, sodium hydroxide, zinc ammonium chloride and zinc. These materials are considered to be characteristic wastes under RCRA.

It is estimated that approximately 10,000 gallons of corrosive acids and caustic are being stored on-site in open-top drums and in large open-top tanks. In addition, the soil at the Site is contaminated and there is debris also being stored on the Site.

The Site is located at the western edge of a densely populated residential community, and is located amongst numerous other commercial industries that employ many hundreds of workers. In the event of a fire, it is anticipated that firefighters would not be able to avoid contamination from acidic runoff and toxic fumes during firefighting efforts. All runoff produced by firefighting efforts would go directly into the storm sewer and thence directly to the East River. Drums of waste chemicals and piles of debris are stacked in front of access doors, which would severely hamper firefighting efforts in the event of a fire occurring on the premises. There is also a potential for direct contact exposure through acts of vandalism or from trespassers. As the business is no longer in operation, there is direct access to the hazardous chemicals via a number of doorways and holes in the sides of the building, where interior lighting conditions are extremely poor. There are numerous holes and openings in the roof that allow rainwater to enter the premises, washing the

spilled acids and caustic onto the soils of the floor of the Site.

B. Threats to the Environment

There is also a threat of release into the environment and therefore, this Site does meet the criteria for such as described in 300.415(b)(2) of the NCP. There is obvious evidence of leakage of hazardous materials onto the soils of the floor of the Site. When open containers of liquids were tested with pH paper during EPA's preliminary assessments, the test paper indicated pH levels of less than 2, thereby meeting the corrosive characteristic as defined by RCRA. Any spilled acidic material will seep from the facility into the environment via the storm sewer system and through the groundwater. The water table in the area is approximately 8-10 feet below the surface of the ground.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from the Site, if not addressed by the response action in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare and the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The objective of the removal action is to eliminate the threat of exposure through direct human contact caused by a release of the hazardous materials at the Site. EPA will mobilize the Emergency and Rapid Response Services contractor to the Site to complete the following:

i. Stabilization and securing of vats, sumps, drums and other containers of hazardous materials.

ii Removal of debris.

ii. Sampling of vats, sumps and drums.

iii. Determination of waste characteristics for vats, sumps and drums and subsequent waste consolidation.

iv. Preparation of waste streams for shipment.

ii Testing of surficial soils and, if appropriate, removal of contaminated soils from the facility.

ii Transportation and disposal of all wastes in accordance with EPA's CERCLA Off-Site Disposal Rule.

The selected mode of transportation and method of disposal will be based on the analytical data.

2. Contribution to Remedial Performance

The proposed action will contribute effectively to any long-term remedial action with respect to the release or threatened release of hazardous substances. This removal action is consistent with any future long-term remedial action that may be undertaken at the Site.

3. Description of Alternative Technologies

Alternative technologies will be considered, so long as they prove to be cost effective and efficient.

4. Engineering Evaluation/Cost Analysis

Due to the time-critical nature of this removal action, an EE/CA will not be prepared.

5. Applicable or Relevant and Appropriate Requirements (ARARs)

ARARs, within the scope of the project, including RCRA and CERCLA regulations that pertain to the disposal of hazardous wastes, will be met to the extent practicable.

6. Project Schedule

The removal action will be initiated pending approval of this Action Memorandum. Based upon previous failures to comply with the RCRA order and the orders from NYCDEP, and based upon statements by Sweeney that he lacks the financial resources to perform the action, it does not appear that the NG, NF or Sweeney would properly or promptly conduct the action nor does it appear that they have the resources to conduct the removal action. Thus it is anticipated that EPA will implement this removal action. Stabilization, over packing, material transfer, staging, segregating, sampling, soil excavation, and backfilling are expected to occur over several months, with final disposal to occur shortly thereafter.

B. Estimated Costs

1. Extramural Costs:	Proposed Costs
Regional Allowance Costs: (Total clean-up contractor	$ 450,000

costs, include labor, equipment, materials and laboratory disposal analysis)

Other Extramural Costs not funded from the Regional Allowance:

Total START costs, including multiplier costs:	$ 100,000
Subtotal Extramural Costs:	$ 550,000
Extramural Costs Contingency: (20% of subtotal, Extramural Costs)	$ 110,000
TOTAL EXTRAMURAL COSTS: (Rounded to nearest $1,000)	$ 660,000

2. Intramural Costs:

Intramural Direct Costs:	$ 50,000
Intramural Indirect Costs:	$ 100,000
TOTAL INTRAMURAL COSTS:	$ 150,000
TOTAL REMOVAL PROJECT CEILING:	$ 810,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action or no action could result in the release of hazardous substances into the environment, thereby exposing the nearby residents, employees and passers by of the surrounding area to hazardous substances and causing further contamination of the soil and the environment.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

Based upon previous failures to comply with the RCRA order and the orders from NYCDEP, and based upon statements by Sweeney that he lacks the financial resources to perform the action, it does not appear that the NG, NF or Sweeney would properly or promptly conduct the action nor does it appear that they have the

resources to conduct the removal action. Due to the nature and amount of hazardous wastes at this Site, a fund-lead time-critical removal action is necessary.

It is anticipated that EPA will be granted consensual access to the Site to conduct a removal action. Efforts will be made to identify any viable PRPs to assume responsibility for the cost of the clean-up. The On-Scene Coordinator will work with the Removal Action Branch, the Office of Regional Counsel and the NYCDEP in an attempt to locate viable PRPs to recover clean-up costs.

We presently anticipate that EPA will send notice of potential responsibility to NG, NF and Sweeney and will seek to determine, by CERCLA Section 104(e) whether any of those responsible parties have financial resources to pay for the response action. Also, we will review the ownership of the property and determine whether the filing of a CERCLA lien under Section 107(l) of CERCLA would be appropriate. We will also seek to determine whether there are any other potentially responsible parties for this action. If there are financially viable potentially responsible parties, we will recommend the initiation of a cost recovery action under CERCLA Section 107(a).

IX. RECOMMENDATION

This decision document represents authorization for the selected Removal Action at the Nelson Galvanizing Site, Long Island City, Queens County, New York, developed in accordance with CERCLA as amended and not inconsistent with the NCP. This decision is based on the Administrative Record for the Site. Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a Removal Action.

This Action Memorandum, if approved, will authorize a total project ceiling of $810,000, with a mitigation ceiling of $450,000. These estimated costs for this project are within the FY-99 and FY-2000 Regional Advice of Allowances.

Please indicate your approval of the authorization of funding for the Nelson Galvanizing Site as per the current Regional redelegation of authority, by signing below.

Approved: _____ Date: 9/30/99
Richard L. Caspe, Director
Emergency and Remedial Response Division

Disapproved: _____ Date: _____
Richard L. Caspe, Director
Emergency and Remedial Response Division

cc: (after approval is obtained)

R. Caspe, 2ERRD
B. Sprague, 2ERRD-RPB
J. Daloia, 2ERRD-RPB-ERT
R. Gherardi, 2OPM-FMB
S. Murphy, 2OPM-GCMB
M. Truono, 2ERRD-RAB
J. Witkowski, 2ERRD-RAB
P. Simon, 2ORC-NYCSFB
B. Bellow, 2CD
R. Cahill, 2CD-PAT
P. McKechnie, 2OIG
T. Johnson, 5202G
B. Dease, 2ERRD-RPB-TSS
C. Kelley, START
A. Raddant, USDOI

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U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION II

In The Matter of NELSON GALVANIZING SITE Nelson Galvanizing, Inc., Nelson Foundry, Inc., and John T. Sweeney, Jr. Respondents Proceeding under Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9606(a).	ADMINISTRATIVE ORDER ON CONSENT Index Number II-CERCLA-10206

I. JURISDICTION

1. This Administrative Order on Consent ("Order") is issued to the above-captioned Respondents (hereinafter referred to as "Respondents") pursuant to the authority vested in the President of the United States under Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9606(a), which authority was delegated to the Administrator of the United States Environmental Protection Agency ("EPA") pursuant to Executive Order 12580 and duly redelegated to the Regional Administrators of EPA. Notice of this Order was provided to the New York State Department of Environmental Conservation ("NYSDEC").

II. FINDINGS OF FACT AND CONCLUSIONS OF LAW

2. The Nelson Galvanizing site (hereinafter the "Site" or the "Nelson Galvanizing Site") includes the real property and the building located at 11-02 Broadway, County of Queens, City of New York, State of New York.

3. Respondent Nelson Foundry, Inc. is a corporation organized and existing under the laws of the state of New York and is a "person" as that term is defined in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21). Respondent Nelson Galvanizing, Inc. is a corporation organized and existing under the laws of the state of New York and is a "person" as that term is defined in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21). Respondent John T.

Sweeney, Jr. is an individual and is a "person" as that term is defined in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

4. The building which is located at 11-02 Broadway, County of Queens, City of New York, State of New York (the "Facility") includes a "facility" as that term is defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

5. Respondent Nelson Foundry, Inc. holds title to the property which includes the Site and is an "owner or operator" (as that term is defined in Section 101(20)(A) of CERCLA, 42 U.S.C. §9601(20)(A)).

6. Respondent Nelson Galvanizing, Inc. is the corporation which owns the business and conducts the operations at the Site and is an "owner or operator" (as that term is defined in Section 101(20)(A) of CERCLA, 42 U.S.C. §9601(20)(A)).

7. Respondent John T. Sweeney, Jr. is the plant manager and is responsible for chemical purchases, handling and storage for the operations conducted at the Site, and is an officer and director of Nelson Foundry, Inc. and Nelson Galvanizing, Inc., and is an "owner or operator" (as that term is defined in Section 101(20)(A) of CERCLA, 42 U.S.C. §9601(20)(A)).

8. Respondents are owners or operators of the Site and are thus responsible parties under Section 107(a) of CERCLA, 42 U.S.C. § 9607(a).

9. The Site is located in the Long Island City section of Queens County, City of New York, State of New York. This densely populated urban area includes a mix of commercial, residential and light industrial land use. Thousands of people live or work within one-half mile of the Site. The Site is within three blocks of the East River. The water table is approximately eight to ten feet below the surface of the Site.

10. Respondent Nelson Galvanizing, Inc. operates a hot dip galvanizing business at the Facility. Its process includes cleansing the surface of fabricated iron or steel material by immersing it in successive baths of caustic and acid solutions, preparing the surface by immersing the material in a zinc salt solution and finally applying a zinc coating to the material by immersing it in molten zinc.

11. The building in which Respondent Nelson Galvanizing, Inc. conducts business operations is a deteriorating one story structure. Large gaps in the roof and siding and a broken drainpipe permit intrusion of precipitation into the Facility. Gates and doors to the Facility are rusted and permanently ajar permitting unrestricted physical access to the Facility. Piles of metal and other debris are scattered throughout the Facility

blocking ingress and egress. Large portions of the interior of the building are without flooring and operations are conducted on bare soil.

12. Within the building are five large process tanks which contain acid and caustic solutions, zinc ammonium chloride solution and molten zinc, as well as additional tanks that appear to be no longer in use.

13. EPA preliminary assessments at the Site on November 19, 1990, November 29, 1990, December 13, 1990 and January 16, 1991 conducted by its On-Scene Coordinator (hereinafter, the "OSC") disclosed hundreds of metal and plastic drums, many open and containing apparent chemical wastes, spent caustic, spent sulfuric acid; bins containing contaminated soil excavated from the floor of the building; and piles of scrap metal and debris. Drums were observed to be corroded and spilling or leaking on to the bare soil floor of the Facility. Many drums were piled one on top of another at precarious angles up to five rows high and other drums were buried in the floor. Standing liquids on the floor indicated a pH of 2 when tested. During a rain event, precipitation coming into the Facility through the roof and a broken drain pipe was observed mixing with materials in an acid tank and overflowing on to the bare soil floor. A stream of liquid coming from under a door of the Facility onto the sidewalk outside the Facility showed a pH of 4 when tested, and EPA has been advised that acidic liquids regularly flow from the Facility into a utility conduit outside with thousands of gallons accumulating every few months.

14. NYCDEP has found that the process wastes from Respondent Nelson Galvanizing, Inc.'s operations had caused the corrosion and collapse of that portion of the New York City sewer system into which the process wastes had been discharged. In August 1988, NYCDEP prohibited Respondent Nelson Galvanizing, Inc. from further discharging its process wastes into the New York City sewer system.

15. Samples of contaminated soil which had been excavated from the floor of the Facility and stored in bins on the Site and samples of liquids stored in barrels on the Site and a liquid standing on the dirt floor beneath a drum on the Site were obtained by EPA on December 13, 1990. Toxic characteristic leaching procedure ("TCLP") analysis was performed on the soil and the liquids were tested for corrosivity. Interim results from analyses of these samples indicated the presence of zinc in concentrations of 5,680 milligrams per liter in the leachate from the soil and interim results from analysis of liquids indicated pH of 1.0, 1.7, and 2.1, respectively on the samples of liquids from the barrels and pH of 2.2 on the sample of the liquid standing on the floor. Substances with a pH of 0 and other substances with a pH of less than 2 were also identified.

These substances are "hazardous substances" as defined in §101(14) of CERCLA, 42 U.S.C. §9601(14).

16. Other hazardous substances identified at the Facility include sulfuric acid, hydrofluoric acid, sodium hydroxide, and zinc ammonium chloride.

17. A "release", as that term is defined in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22), of hazardous substances has occurred at the Site, in that, among other things, hazardous substances have leaked, spilled and/or been disposed of into the environment at or from the Facility. There is a threat of further such releases at and from the Site.

18. The substances present at the Site can cause a variety of adverse human health effects.

19. The hazards posed by the Facility include the threat of direct contact with hazardous substances through dermal contact, ingestion and inhalation by individuals working at or trespassing onto the Facility or passing near the Facility, the threat of further releases of hazardous substances at the Site, the threat of further migration of hazardous substances present in soils at the Site, and the threat of contamination of groundwater. There is the potential threat of human exposure through direct contact or discharge into the environment.

20. Enforcement action was previously taken at the Site by the New York City Department of Environmental Protection ("NYCDEP"). On August 19, 1988, after having determined that conditions at the Site presented an immediate and substantial danger to the public health, welfare and the environment, the Commissioner of NYCDEP issued an order pursuant to the New York City Hazardous Substances Emergency Response Law, New York City Administrative Code §24-610, directing Respondents to undertake specific measures to abate the hazardous conditions at the Facility. According to NYCDEP, Respondents have failed to comply with the terms of the Order. New York City filed an action in Supreme Court, New York County, in January 1991 seeking to enforce their order and seeking penalties for failure to comply and damages for monies expended by NYCDEP at the Facility.

21. Other enforcement action was taken by NYSDEC. On October 3, 1989 NYSDEC conducted a compliance inspection under the New York State Hazardous Waste Management Act at the Facility. On January 24, 1990 NYSDEC issued a warning letter to Respondents Nelson Galvanizing, Inc. and John T. Sweeney, Jr. documenting numerous violations of New York State Hazardous Waste Regulations and requesting correction of the violations within thirty days. On March 12, 1990, a second letter was sent by NYSDEC stating that no response had been received to the first letter and requiring a response within a further fifteen days. The violations

documented by New York State included: improper drum management, leaking drums, open containers, and inadequate aisle space. Based upon observations made by EPA during preliminary assessments of the Site, the conditions giving rise to these violations have not been corrected.

22. On January 30, 1991, the Regional Administrator of EPA Region II approved an Action Memorandum to conduct a removal action at the Site. Respondents were given written notice by EPA on January 31, 1991 of the removal action with a request to provide consent for access needed by EPA to undertake the action. On February 4, 1991, Respondents, through their attorney, represented that they could perform the removal action properly and promptly and requested permission to do so subject to EPA oversight pursuant to an Administrative Order on Consent.

23. Prior to the issuance of this Order, Respondent John T. Sweeney, Jr., in order to demonstrate to EPA Respondents' ability to properly and promptly complete the work contemplated by this Order, placed $250,000 in escrow pursuant to an escrow agreement, the terms of which are satisfactory to EPA, which monies will be available towards satisfaction of Respondents' obligations under this Order. John T. Sweeney, Jr. represents to EPA that he is not aware of any judgments against him which could serve as the basis of a claim against the monies placed in escrow. A copy of the escrow agreement is annexed as Attachment I to this Order.

24. Respondents have been given an opportunity to discuss with EPA the basis for issuance of this Order and its terms.

III. DETERMINATION

25. Based upon the Findings set forth above and other information available to EPA, EPA has determined that the release and threat of release of hazardous substances into the environment from the Nelson Galvanizing Site may present an imminent and substantial endangerment to the public health, welfare, and the environment, within the meaning of Section 106(a) of CERCLA, 42 U.S.C. § 9606(a).

IV. ORDER

26. Based upon the foregoing Findings of Fact and Conclusions of Law, Determination, and other information available to EPA, it is hereby ordered and agreed that Respondents shall undertake a response action at the Site in accordance with the requirements specified below. All activities specified below shall be initiated and completed as soon as possible even though maximum time periods for their completion are specified herein.

Description of Work

27. Within twenty-one (21) days of the effective date of this Order, Respondents shall submit to EPA for review and approval a detailed work plan (hereinafter, the "Work Plan") providing a detailed explanation of how each task of the Removal Action will be accomplished including, but not limited to, the performance of the following tasks:

a. Site inventory: This task shall include development and execution of a plan for a complete inventory of hazardous substances, pollutants, contaminants, contaminated soil, and debris, including all barrels, bins and other containers holding such material.

b. Site preparation: This task shall include development and execution of a plan for Site security measures to prevent unauthorized ingress into the Facility; to prevent intrusion of precipitation into the Facility; and to prepare a staging/sampling area.

c. Sampling and analysis: This task shall include development and execution of a plan for sampling and analysis of the materials identified during the Site inventory to allow for the proper handling and disposition of materials.

d. Staging: This task shall include development and execution of a plan for staging of the materials identified during the Site inventory including isolating and containing any leakage or spillage; overpacking leaking drums and, if EPA deems necessary, drums which are otherwise in poor condition; and orderly placement and protection of containers within staging areas.

e. Disposition: This task shall include development and execution of a plan for final disposition of the materials identified during the Site inventory including selection of licensed waste hauler and the waste treatment, storage, or disposal facilities that Respondents propose to use, if the proposed disposition of drums is to be by off-Site disposal or description of other alternatives for disposal including a description of how each proposed method of disposition will comply with all applicable laws and regulations.

f. Post removal: This task shall include development of a plan to address post-removal compliance activities.

28. The Work Plan shall also include:

a. a detailed time schedule for performance of the specific tasks set forth in this Order, including a detailed description of how those tasks will be accomplished;

b. a financial-costs reporting system to track the estimated costs of complying with this Order and the actual costs incurred during performance;

c. an overall Site operations plan for performance of the tasks specified in this Order, including identification of (or provision for later advance identification of) the contractors, subcontractors and other professional personnel to be used and their respective responsibilities and qualifications including curricula vitae;

d. a Site activities contingency plan; and

e. a Site Health and Safety Plan;

f. a Site community relations plan.

29. Following EPA's approval of the Work Plan, or the Work Plan as amended, EPA shall notify Respondents and the Work Plan as approved shall be deemed incorporated into this Order. Within ten (10) days of EPA's approval of the Work Plan or the Work Plan as amended, Respondents shall commence implementation of the Work Plan.

30. All work conducted by Respondents pursuant to this Order shall be completed within one hundred and fifty (150) days after the commencement of work under the Work Plan unless an extension is specifically approved by EPA in writing.

Designated Coordinator, On-Scene Coordinator, Other Personnel

31. Within three (3) business days of the effective date of this Order, Respondents shall select a coordinator, to be known as the Designated Coordinator, and submit the name, address, and telephone number of the Designated Coordinator to EPA. The Designated Coordinator shall be responsible for oversight of the implementation of this Order. He or she shall have technical expertise sufficient to adequately oversee all aspects of the work contemplated by this Order. EPA correspondence pursuant to this Order to the Respondents will be sent to the Designated Coordinator. Respondent may change its Designated Coordinator provided that at least ten days prior written notice is given to EPA of the desired change.

32. The current EPA On-Scene Coordinator for the Site is: Paul Kahn, Response and Prevention Branch, Emergency and Remedial Response Division, U.S. Environmental Protection Agency, Woodbridge Avenue, Edison, NJ 08837, (201) 321-6617. EPA will notify the Designated Coordinator if EPA's On-Scene Coordinator should change.

33. Respondent shall provide a copy of this Order to each contractor and subcontractor retained to perform the work required by this Order. Respondents shall include in all contracts or subcontracts entered into for work required under this Order provisions stating that such contractors or subcontractors, including their agents and employees, shall perform activities required by such contracts or subcontracts in compliance with this Order and all applicable laws and regulations. Respondents shall be responsible for ensuring that their contractors and subcontractors perform the work contemplated herein in accordance with this Order.

34. All activities required of Respondents under the terms of this Order shall be performed only by well-qualified persons possessing all necessary permits, licenses, and other authorizations required by federal, state, and local governments, and all work conducted pursuant to this Order shall be performed in accordance with good engineering practice.

Insurance/Financial Responsibility

35. At least seven (7) days prior to commencing any work at the Site pursuant to this Order, Respondents shall submit to EPA a certification that Respondents or their contractors and subcontractors have adequate insurance coverage or indemnification for liabilities for injuries or damages to persons or property which may result from the activities to be conducted by or on behalf of Respondents pursuant to this Order. Respondents shall ensure that such insurance or indemnification is maintained for the duration of the Work required by this Order.

36. Respondent John T. Sweeney, Jr. shall maintain the escrow account described in paragraph 23 of this Order or such other measure as EPA may approve (the "Financial Assurance") in accordance with its terms, until the completion of all work required pursuant to this Order and the receipt by Respondents of the notification from EPA pursuant to paragraph 83 of this Order that the work required pursuant to this Order has been fully carried out and until Respondents have reimbursed EPA for all response costs pursuant to paragraph 75 of this Order. Respondents acknowledge that EPA is a third party beneficiary of the Financial Assurance to the extent provided therein and shall not cause or suffer the modification or termination of the Financial Assurance, except pursuant to its terms, without the

written approval of EPA. Respondent John T. Sweeney, Jr. will notify EPA prior to requesting any funds to be withdrawn from the Financial Assurance and will not request the withdrawal of such funds if EPA objects to such withdrawal. In the event that the estimated cost to complete the work contemplated in this Order is increased during the performance of this Order, Respondents shall increase the amount of the Financial Assurance, so as to continue to assure the prompt and proper completion of the work by Respondents.

Reporting Requirements

37. All reports and other documents submitted by Respondents to EPA (other than the weekly progress reports referred to below) which purport to document Respondents' compliance with the terms of this Order shall be signed by a responsible corporate official(s) of Respondents.

38. During the implementation of this Order, Respondents shall, within five days after the end of each weekly period, provide weekly written progress reports to EPA which fully describe all activities undertaken pursuant to this Order. Such progress reports shall include, among other things, (a) the actions taken toward achieving compliance with this Order during the previous two-week period, and, to the extent of the failure to complete actions listed in a Prospective Report for such period, the reason for such failure; (b) all results of sampling and analysis and all other data related to the work performed pursuant to this Order received by Respondents during the period; (c) financial tracking of the costs incurred or obligated during such period as compared to the current estimate of the costs required to comply with this Order; (d) all delays encountered or anticipated that may affect the future schedule for completion of the work required hereunder, and a description of all efforts made to mitigate those delays or anticipated delays and proposals for alternatives to circumvent the effect of such delays; and (e) a description of all activities to be undertaken pursuant to this Order during the weekly period commencing after submission of the report.

39. A final report shall be submitted by the Respondents within six (6) weeks after the completion of all activities performed under this order. The final report shall describe the tasks performed under this Order and shall include all data related to the work performed and analyses of all samples taken during the action and a detailed description of all drums, bins, dumpsters and other containers for hazardous substances, pollutants or contaminants removed from the Site.

40. All work plans, reports, notices and other documents required to be submitted to EPA under this Order shall be sent to the following addressees:

a. Chief, New York/Caribbean Compliance Branch
Emergency and Remedial Response Division
United States Environmental Protection Agency
26 Federal Plaza, Room 747
New York, New York 10278

Attention: Nelson Galvanizing Site Project Manager

b. Chief, Response and Prevention Branch
Emergency and Remedial Response Division
United States Environmental Protection Agency
Woodbridge Avenue
Edison, New Jersey 08837

Attention: Paul L. Kahn, On-Scene Coordinator, Nelson Galvanizing Site

c. Office of General Counsel
New York City Department of Environmental Protection
Room 2358
One Center Street
New York, New York 10007

d. New York State Department of Environmental Conservation
47-40 21st Street
Long Island City, New York
Attention: Ezra Aviles, Hazardous Waste Remediation Unit

41. Upon the occurrence of any event during performance of the work required hereunder which, pursuant to Section 103 of CERCLA, requires immediate reporting to the National Response Center, Respondents, in addition to making all required notification under federal, state or local laws, shall orally notify the OSC (or, in the event of the unavailability of the OSC, the Chief of the Response and Prevention Branch of the Emergency and Remedial Response Division of EPA, Region II).

42. As appropriate during the course of implementing the actions required of Respondents pursuant to this Order, Respondents or their consultant(s) or contractor(s), acting through the Designated Coordinator, may confer with EPA concerning the required actions. Based on new circumstances or new information not in the possession of EPA on the date of issuance of this Order, the Designated Coordinator may submit a request to the OSC, in writing, for approval of a modification to the Work Plan. If approved by the EPA in writing, such modification shall be deemed incorporated into this Order.

43. In the event of a significant change in conditions at the Site, or in the event of emergency circumstances relating to public health, welfare or the environment associated with contamination at the Site, Respondents shall immediately notify the OSC at the following telephone numbers: office (201) 321-6617; Pager (201) 880-2360; non business hours (201) 270-8860 (or, in the event of the unavailability of the OSC, the Chief of the Response and Prevention Branch of EPA's Emergency and Remedial Response Division at (201) 321-6656). In the event that EPA determines that (a) the activities performed pursuant to this Order, (b) significant changes in conditions at the Site, or (c) emergency circumstances occurring at the Site, pose a threat to human health or the environment, EPA may direct Respondents to stop further implementation of any actions pursuant to this Order or to take other and further actions reasonably necessary to abate the threat. This provision is not to be construed so as to limit any powers EPA has under the National Oil and Hazardous Substances Pollution Contingency Plan, 40 C.F.R. Part 300) ("NCP") or under any other applicable law or regulation.

Oversight

44. During the implementation of the requirements of this Order, Respondents and their contractor(s) and subcontractors shall be available for such conferences with EPA and inspections by EPA at and around the Site and at laboratories where analytical work is being done hereunder as EPA may determine are necessary to adequately oversee the work being carried out or to be carried out by Respondents.

45. Respondents and their employees, agents, contractor(s) and consultant(s) shall cooperate with EPA in its efforts to oversee Respondents' implementation of this Order.

Access and Availability of Data

46. Respondents shall obtain in a timely fashion such access to the Site and any other premises where activities under this Order are to be performed as is necessary for Respondents to carry out the requirements of this Order.

47. EPA and its designated representatives, including but not limited to employees, agents, contractors and consultants thereof, as well as NYSDEC and NYCDEP, shall be permitted to observe the work carried out pursuant to this Order. Respondents shall permit EPA, NYSDEC and NYCDEP and EPA's designated representatives full access to and freedom of movement at the Site and any other premises where work under this Order is to be performed, at all times, including, but not limited to, any time that work under this Order is being performed, for purposes of inspecting or observing Respondents' progress in implementing the requirements of this Order, verifying the information submitted

to EPA by Respondents, conducting investigations relating to contamination at the Site, or for any other purpose EPA determines to be reasonably related to EPA oversight of the implementation of this Order.

48. All data, information and records created, maintained or received by Respondents or their contractor(s) or consultant(s) in connection with implementation of the work under this Order (other than documents covered by the attorney work-product or attorney-client privilege), including but not limited to contractual documents, invoices, receipts, work orders and disposal records, shall, without delay, be made available to EPA upon request. EPA shall be permitted to copy all such documents. No such data, information, or records shall be destroyed for six (6) years after completion of the work required by this Order without either the express written approval of EPA or a written offer by Respondents to provide such material to EPA, followed by EPA's written rejection of that offer. Following said six-year period, Respondents shall notify EPA at least thirty (30) days prior to the destruction of any such documents.

49. Upon request by EPA, Respondents shall provide EPA or its designated representatives with duplicate and/or split samples of any material sampled in connection with the implementation of this Order.

50. Notwithstanding any other provision of this Order, EPA hereby retains all of its information gathering, access, and inspection authority under CERCLA, the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6901 et seq., and any other applicable statute or regulations.

Plans and Reports Requiring EPA Approval

51. If EPA disapproves or otherwise requires any modifications to any plan, report or other item required to be submitted to EPA for approval pursuant to this Order, Respondents shall have fourteen (14) days from the receipt of notice of such disapproval or the required modifications to correct any deficiencies and resubmit the plan, report, or other written document to EPA for approval, unless a shorter or longer period is specified in the notice. Any notice of disapproval will include an explanation of why the plan, report, or other item is being disapproved. EPA will provide Respondents with an opportunity to consult with EPA after the receipt of such notice. Respondents shall address each of the comments and resubmit the plan, report, or other item with the required changes within the time stated above. At such time as EPA determines that the plan, report, or other item is acceptable, EPA will transmit to Respondents a written statement to that effect.

52. If any plan, report, or other item required to be submitted to EPA for approval pursuant to this Order cannot be approved by EPA, even after being resubmitted following Respondents' receipt of EPA's comments on the initial submittal, Respondents shall be deemed to be out of compliance with this Order. If any resubmitted plan, report, or other item, or portion thereof, is disapproved by EPA, EPA may again direct Respondents to make the necessary modifications thereto, and/or EPA may amend or develop the item(s) and recover the costs from Respondents of doing so. Respondents shall implement any such item(s) as amended or developed by EPA.

53. EPA shall be the final arbiter in any dispute regarding the sufficiency or acceptability of all documents submitted and all activities performed pursuant to this Order. EPA may modify those documents and/or perform or require the performance of additional work unilaterally.

Community Relations

54. Respondents shall cooperate with EPA in providing information relating to the work required hereunder to the public. As requested by EPA, Respondents shall participate in the preparation of all appropriate information disseminated to the public and in public meetings which may be held or sponsored by EPA to explain activities at or concerning the Site.

General Provisions

55. Each Respondent is jointly and severally liable for the implementation of the work required by this Order.

56. This Order shall apply to and be binding upon Respondents and Respondents' receivers, trustees, successors, heirs and assigns. Respondents agree to instruct their officers, directors, employees, and agents involved in the performance of the work required by this Order to cooperate in carrying out the obligations of Respondents under this Order. Respondents agree that its officers, directors, employees, and agents involved in the performance of the work required by this Order shall take all necessary steps to accomplish the performance of said work in accordance with this Order.

57. All actions and activities carried out by Respondents pursuant to this Order shall be performed in accordance with all applicable federal, state, and local laws, regulations, and requirements, including the NCP and any amendments thereto that are promulgated while this Order is in effect.

58. Notwithstanding any other provision in this Order, and in accordance with Section 121(e)(1) of CERCLA, no federal, state, or local permits shall be required for any portion of the work

required hereunder that is conducted entirely on-Site, although Respondents must comply with the substantive requirements that would otherwise be included in such a permit. Respondents shall obtain all permits necessary for off-Site work under federal, state, or local laws and shall submit timely applications and requests for any such permits. This Order is not, nor shall it act as, a permit issued pursuant to any federal or state statute or regulation.

59. All plans, reports and other submittals required to be submitted to EPA pursuant to this Order shall, upon approval by EPA, be deemed to be incorporated in and an enforceable part of this Order.

60. All waste disposal conducted by Respondents pursuant to this Order shall be performed in compliance with all requirements of CERCLA, including Section 121(d)(3), 42 U.S.C. §9621(d)(3), RCRA, the Toxic Substances Control Act ("TSCA"), 15 U.S.C. §§2601-2629, and all regulations promulgated pursuant thereto, and all other applicable federal and state laws and regulations. In addition, all waste disposal conducted by Respondents pursuant to this Order shall be carried out in compliance with the NCP and all applicable EPA policies and guidance documents. In addition, if hazardous substances from the Site are to be shipped to a waste management facility outside of New York State, Respondents shall insure that the environmental agency of the accepting state is notified of the following: (a) the name and location of the facility to which the wastes are to be shipped; (b) the type and quantity of waste to be shipped; (c) the expected schedule for the waste shipments; and (d) the method of transportation. Respondents shall provide such notification to the affected state in writing as soon as practicable, but in any event at least five (5) business days prior to the said shipments.

61. At the time of completion of all activities required by this Order, demobilization shall include such sampling as EPA deems necessary and proper disposal or decontamination of protective clothing, remaining laboratory samples, and any equipment or structures constructed to facilitate the cleanup.

62. All documents submitted by Respondents to EPA in the course of implementing this Order shall be available to the public unless identified as confidential by Respondents pursuant to 40 CFR Part 2, Subpart B, and determined by EPA to merit treatment as confidential business information in accordance with applicable law. In addition, EPA may release all such documents to other government agencies which may make those documents available to the public unless Respondents conform with applicable law and regulations of such agencies regarding confidentiality. Respondents shall not assert a claim of confidentiality regarding any monitoring or hydrogeologic data, any information specified under Section 104(e)(7)(F) of CERCLA,

or any other chemical, scientific or engineering data relating to the work performed hereunder.

63. Neither EPA nor the United States, by issuance of this Order, assumes any liability for any injuries or damages to persons or property resulting from acts or omissions by Respondents or Respondents' employees, agents, contractor(s), or consultant(s) in carrying out any action or activity pursuant to this Order, nor shall EPA or the United States be held as or be held out to be a party to any contract entered into by Respondents or Respondents' officers, employees, agents, contractor(s), or consultant(s) in carrying out any action or activity pursuant to this Order.

64. Respondents agree to indemnify and hold harmless EPA and the United States Government, its agencies, departments, agents, and employees, from all claims, causes of action, damages, and costs of any type or description by third parties for any injuries or damages to persons or property resulting from acts or omissions of Respondents, their officers, directors, officials, agents, servants, receivers, trustees, successors, or assigns as a result of the fulfillment or attempted fulfillment of the terms and conditions of this Order by Respondents.

65. Nothing contained in this Order shall affect any right, claim, interest, defense, or cause of action of any party hereto with respect to third parties.

66. Nothing in this Order shall be construed to constitute preauthorization under Section 111(a)(2) of CERCLA, 42 U.S.C. §9611(a)(2), and 40 CFR §300.700(d).

67. Respondents agree to waive any rights they may have to seek reimbursement pursuant to Sections 106(b)(2), 111 and/or 112 of CERCLA, 42 U.S.C. §§ 9606(b)(2), 9611, 9612, or any other provision of law, either directly or indirectly, from the Hazardous Substance Superfund of costs incurred by Respondents in complying with this Order.

68. By signing this Order and taking actions under this Order, Respondents do not necessarily agree with EPA's Findings of Fact and Conclusions of Law. Furthermore, the participation of Respondents in this Order shall not be considered an admission of liability and is not admissible in evidence against Respondents in any judicial or administrative proceeding other than a proceeding by the United States, including EPA, to enforce this Order or a judgment relating to it. Respondents retain their rights to assert claims against other potentially responsible parties at the Site. However, Respondents agree not to contest the validity or terms of this Order, or the procedures underlying or relating to it in any action brought by the United States, including EPA, to enforce its terms.

69. Nothing herein shall constitute or be construed as a satisfaction or release from liability for Respondents or Respondents' officers, directors, employees, agents, contractors, consultants, receivers, trustees, successors, or assigns, or for any other individual or entity provided, however, upon receipt by Respondents of the notification from EPA pursuant to paragraph 83 of this Order that the work required pursuant to this Order has been fully carried out, Respondents shall be deemed to have satisfied its obligations to EPA pursuant tc this Order except for its obligations to maintain records pursuant to paragraph 48 of this Order and its obligations to reimburse EPA for response costs pursuant to paragraph 75 of this Order. Nothing herein shall constitute a finding that Respondents are the sole responsible parties with respect to the release and threatened release of hazardous substances at and from the Site.

70. No oral advice, guidance, suggestions or comments by EPA shall be construed to relieve Respondents of any of their obligations under this Order.

71. Respondents' activities under this Order shall be performed within the time limits set forth herein, or otherwise established or approved by EPA, unless performance is delayed by events which constitute a force majeure. For purposes of this Order, "force majeure" is defined as any event arising from causes beyond Respondents' control. "Force majeure" shall not include inability of Respondents to pay the costs or expenses associated with complying with this Order or increases in such costs or expenses. When an event constituting a force majeure occurs, Respondents shall perform the affected activities within a time period which shall not exceed the time provided in this Order together with the period of delay attributed to the force majeure; provided, however, that no deadline shall be extended beyond a period of time that is reasonably necessary. Respondents shall use their best efforts to avoid or minimize any delay or prevention of performance of their obligations under this Order.

72. Respondents shall immediately verbally notify the OSC if circumstances have occurred or are likely to occur which may delay or prevent the performance of any activity required by this Order, regardless of whether those circumstances constitute a force majeure. If the OSC cannot be reached, Respondents shall leave a message at his or her office. In addition, Respondents shall notify EPA in writing within three (3) calendar days after the date when Respondents first become aware of the circumstances which may delay or prevent performance. Such written notice shall be accompanied by all available and pertinent documentation, including third-party correspondence, and shall contain the following: (a) a description of the circumstances, and Respondents' rationale for interpreting such circumstances as

being beyond their control (should that be Respondents' claim); (b) the actions (including pertinent dates) that Respondents have taken and/or plans to take to minimize any delay; and (c) the date by which or the time period within which Respondents propose to complete the delayed activities. Such notification shall not relieve Respondents of any of their obligations under this Order. Respondents' failure to timely and properly notify EPA as required by this paragraph shall constitute a waiver of Respondents' right to claim an event of force majeure. The burden of proving that an event constituting a force majeure has occurred shall rest with Respondents.

73. This Order may be amended by mutual agreement of EPA and Respondents. Such amendments shall be in writing and shall have as their effective date that date on which such amendments have been signed by both Respondents and EPA.

74. Except where expressly stated otherwise herein, all time periods specified in this Order shall be construed as calendar days rather than business days.

Reimbursement

75. Respondents agree to reimburse EPA for all response costs, as the term is defined in Section 101(25) of CERCLA and relevant case law, incurred by the U.S. Government prior to the issuance and during the performance of this Order, including both direct and indirect costs. EPA will periodically transmit to Respondents accountings of the costs incurred by EPA in the form of the Superfund Accounting Unique Report ("SPUR") or such other accounting chosen by EPA and regularly used in EPA Region II to track costs. Except as otherwise provided in the next paragraph below, Respondents shall, within thirty (30) days of receipt of each such accounting, remit a cashier's or certified check for the amount of those costs, made payable to the "Hazardous Substance Superfund." Such payments shall contain a reference to the index number of this Order and shall be mailed to the following address:

EPA - Region II
Attn: Superfund Accounting
P.O. Box 360188M
Pittsburgh, PA 15251

Such payments shall also be accompanied by a letter of explanation including the name and address of the Respondents, the name of the Site (the Nelson Galvanizing Site), and the EPA Region number (EPA Region II); a copy of the letter and the check shall be sent to the EPA addressees listed in paragraph 40 above. Pursuant to 31 U.S.C. § 3717, interest shall accrue on any amounts overdue under this paragraph at a rate established by the Department of Treasury under 31 U.S.C. § 3717 for any period of such delinquency.

76. Respondents may dispute claims for reimbursement submitted by EPA pursuant to the preceding paragraph by submitting to EPA, in writing, within twenty (20) days of receipt of EPA's accounting of its costs, a notice identifying the disputed claim and Respondents' basis for the dispute. Respondents' right to dispute EPA's claims for reimbursement is limited to accounting errors and to the inclusion of costs outside the scope of this Order. All undisputed costs shall be remitted by Respondents in accordance with the preceding paragraph. Disputed costs shall be paid by Respondents into an interest-bearing escrow account maintained while the dispute is pending and, may be designated by Respondents within the financial mechanism described in paragraph 36 of this Order, if such financial mechanism is interest bearing. The escrow agent may be an attorney or firm of attorneys duly admitted to practice in the state of New York or other escrow agent satisfactory to EPA. Respondents bear the burden of proof of establishing an EPA accounting error or the inclusion of costs beyond the scope of this Order. In addition, Respondents shall provide EPA with a copy of the correspondence that establishes and funds the escrow account, including such information as the identity of the bank and bank account under which the escrow is established as well as a bank statement showing the initial or then current balance of the escrow account.

77. Disputes pursuant to the foregoing paragraph shall be resolved by the Chief of the Response and Prevention Branch of the Emergency and Remedial Response Division of EPA Region II. The decision of the Branch Chief shall constitute the resolution of the dispute and shall be EPA's final decision. If the Branch Chief rejects Respondent's position, in whole or in part, regarding an accounting error or improperly included cost, Respondent shall, within five (5) days of receipt of the determination cause the escrow agent to remit the amount due, together with accrued interest, to EPA. If the Branch Chief sustains Respondents position, in whole or in part, regarding an accounting error or improperly included cost, Respondent may terminate the escrow and retain the funds, and accrued interest, which are not due to EPA.

Enforcement

78. Failure of Respondents to expeditiously and completely carry out the terms of this Order may result in EPA conducting the required actions, pursuant to Section 104(a) of CERCLA, 42 U.S.C. §9604(a).

79. If Respondents fail, without prior EPA approval, to comply with any of the requirements or time limits set forth in or established pursuant to this Order, and such failure is not excused under the terms of paragraph 71 above, Respondents, as a

group, shall, upon demand by EPA, pay a stipulated penalty to EPA in the amount indicated below for each day of noncompliance:

Days After Required Date	Stipulated Penalty
1 to 5 days	$ 600/day
6 to 15 days	$ 1,000/day
16 to 25 days	$ 2,000/day
26 to 40 days	$ 2,500/day

Any such penalty shall accrue as of the first day after the applicable deadline has passed, and shall continue to accrue until the noncompliance is corrected, through the 40th day of such noncompliance. Such penalties shall be due and payable ten (10) days following receipt of a written demand from EPA. Payment of any such penalty to EPA shall be made by cashier's or certified check made payable to the "Hazardous Substance Superfund," with a notation of the index number of this Order, and shall be mailed to the address set forth in paragraph 75 above. A letter stating the basis for the penalties, the name and address of the Respondents, the name of the Site, and the EPA Region number shall accompany each such payment; a copy of the letter and the check shall be mailed to the EPA addressees listed in paragraph 40, above.

80. Notwithstanding any other provision of this Order, failure of Respondents to comply with any provision of this Order may result in the initiation of an enforcement action against Respondents, including enforcement actions pursuant to, Sections 106(b)(1) and/or 107(c)(3) of CERCLA, 42 U.S.C. §§ 9606(b)(1), 9607(c)(3), which may result in the assessment of fines of up to $25,000 for each day of such noncompliance and/or the assessment of punitive damages.

81. Notwithstanding any other provision of this Order, EPA reserves its right to bring an action against Respondents (or any other responsible party) pursuant to Section 107(a) of CERCLA, 42 U.S.C. §9607(a), for recovery of any costs which have been or may be incurred by the United States Government with respect to the Site.

82. Nothing herein shall preclude EPA from taking any additional enforcement actions and/or other actions as it may deem necessary or appropriate for any purpose, including, without limitation the investigation, prevention, or abatement of a threat to the public health, welfare, or the environment arising from conditions at the Site, the utilization of the financial assurances provided to EPA pursuant to paragraphs 23 and 36 of this Order, or actions under Sections 3008(a), 3008(h) 3013, and 7003 of RCRA, 42 U.S.C. §§ 6928(a), 6928(h), 6934, and 6973.

Termination and Satisfaction

83. When Respondents are satisfied that the work required by this Order has been completed, Respondents shall submit a written report to EPA specifically setting forth how Respondents have complied with this Order and have satisfactorily implemented the requirements set forth herein. This report shall be accompanied by appropriate documentation which substantiates to EPA's satisfaction Respondents' assertion that the work required hereunder has been satisfactorily completed. The report shall further include sworn statements by authorized representatives of Respondents setting forth the following:

> "I certify that the information contained in and accompanying this submission to the United States Environmental Protection Agency is true, accurate, and complete."
>
> "As to the following specifically identified portion(s) of this submission which I cannot attest to as true, accurate and complete on the basis of personal knowledge, I hereby certify and/or declare that I have fully investigated the bases of this submission, and the submission itself in its entirety for the purpose of making this certification and/or declaration, and that on information and belief, it is true, accurate and complete in every respect. I further certify and/or declare that I am fully responsible for its content to the fullest extent allowable by law."

Upon a determination by EPA, following its receipt of the aforesaid sworn statement and report, that the work required pursuant to this Order has been fully carried out in accordance with this Order, EPA shall so notify Respondents in writing.

Effective Date and Effect of Consent

84. This Order shall become effective on the date of its receipt by Counsel for Respondents. All times for performance of actions or activities required herein will be calculated from said effective date.

85. Respondents agree not to contest the authority or jurisdiction of the Regional Administrator of EPA Region II to issue this Order.

U.S. ENVIRONMENTAL PROTECTION AGENCY

William J. Muszynski

CONSTANTINE SIDAMON-ERISTOFF
Regional Administrator
U.S. Environmental Protection Agency
Region II

3/13/91
Date of Issuance

CONSENT

Respondents, have had an opportunity to confer with EPA to discuss the terms and the issuance of this Order. Respondents hereby consent to the issuance of this Order and to its terms. Furthermore, the individual(s) signing this Order on behalf of Respondents certifies that he or she is fully and legally authorized to agree to the terms and conditions of this Order and to bind Respondents.

NELSON FOUNDRY, INC.

John T Sweeney Jr — 3/11/91

(signature) DATE

John T. Sweeney JR

(printed name of signatory)

Pres.

(title of signatory)

NELSON GALVANIZING, INC.

John T Sweeney Jr — 3/11/91

(signature) DATE

John T Sweeney JR

(printed name of signatory)

PRES

(title of signatory)

John T. Sweeney, Jr.

John T Sweeney Jr — 3/11/91

(signature) DATE

John T Sweeney JR

(printed name)

NGI 7.3022

JOHN T. SWEENEY, JR.
c/o Nelson Galvanizing, Inc.
11-02 Broadway
Long Island City, N.Y. 11106

March 11, 1991

Berle, Kass & Case
45 Rockefeller Plaza
Suite 2350
New York, N.Y. 10111

Attention: Stephen J. Ritchin, Esq.

Dear Sirs:

Administrative Order on Consent II CERCLA-10206 (the "Order") is expected to be issued forthwith by the United States Environmental Protection Agency ("EPA") and consented to by John T. Sweeney, Jr. ("Sweeney" or the "undersigned" or "I"), Nelson Galvanizing, Inc., and Nelson Foundry, Inc. I expect that the Order will require me to establish and maintain an escrow account to assure EPA of the performance of all obligations under the Order, including the proper and prompt completion of the work contemplated by the Order. I request that you act as escrow agent in accordance with the terms of the following Agreement.

1. Deposit. I herewith deposit with you the sum of $250,000 (U.S.), receipt of which is hereby acknowledged by you. Please hold this sum, together with interest, if any, earned thereon (the "Escrow Amount"), in escrow in your special account.

I authorize and direct you to release such sum, or portions thereof, only when and as specified in this Agreement. I understand and agree that interest will be paid on the Escrow Amount only to the extent earned and that any interest will be credited to the Escrow Amount. I have executed and am providing to you herewith a Private Client Escrow Sub-Account Application, and I authorize you to rely on the information set forth thereon.

2. Releases. The undersigned or EPA will submit to you from time to time one or more completed release authorizations, in exactly the forms attached hereto as Exhibits A or B, as the case may be (a "Release Authorization"), executed by the undersigned or EPA. Upon your receipt of a Release Authorization, I authorize and direct you to draw funds from the Escrow Amount in the amount specified, and to remit such funds to the payee specified at the address set forth in the Release Authorization, together with any letter or letters which the undersigned or EPA may furnish to you along with such Release Authorization and instruct you to enclose with such payment, provided, however that if you receive a Release Authorization in the form attached hereto as Exhibit A (a "Release Authorization - A"), and if you shall receive, prior to remitting the payment authorized by such Release Authorization - A, a cancellation of such Release Authorization - A, in exactly the form attached hereto as Exhibit C, with all blanks completed (a "Cancellation

of Release Authorization"), you shall not remit the payment authorized by such release Authorization - A. You are to prepare and send out payments in the order you receive Release Authorizations. Each Release Authorization shall cover one payment only. You are to send to EPA, as Notices under this Agreement, copies of each check or other means of payment issued by you under the Agreement pursuant to a Release Authorization, as well as copies of each letter or letters enclosed with a payment sent by you pursuant to a Release Authorization. Upon your sending of any payment for an amount specified in a Release Authorization, you are immediately discharged from all responsibility as escrow agent under this Agreement or otherwise with respect to such funds.

3. Excess Draws. In no event are you to prepare or send any payment if the amount specified in the Release Authorization for that payment, when added to the amounts specified in previous Release Authorizations (excepting Release Authorizations pursuant to which payments were not remitted due to prior receipt of a Cancellation of Release Authorization), exceeds the Escrow Amount. In such case, you are directed to return such Release Authorization to the sender with a notation indicating the amount of such excess.

4. Indemnity. Nelson Galvanizing, Inc., Nelson Foundry, Inc. and the undersigned agree, jointly and severally, to hold you harmless from and against any and all damage, liability, loss, claim or expense of any kind (including, without limitation, your own or others' attorneys' fees) which may arise, directly or indirectly, out of your acting as escrow agent under this Agreement, except such as may be due to your gross negligence or willful misconduct. Our obligation under this Paragraph 4 shall survive any expiration or other termination of this Agreement. Nelson Galvanizing, Inc. and Nelson Foundry, Inc. have executed this Agreement for purposes of agreeing to the provisions of this Paragraph 4.

5. Disputes. In the event that any party other than EPA makes a claim against all or any portion of the Escrow Amount, you may, after fourteen days' notice to the undersigned and EPA, deposit all or any part of the Escrow Amount with the United States District Court for the Eastern District of New York (the "Court"), and thereupon you shall be, without any further action on your part or on the part of the undersigned, released from all claims under this Agreement or otherwise as escrow agent as to the portion of the Escrow Amount deposited with the Court, or, alternatively, you may continue to hold the Escrow Amount, and act as escrow agent pursuant to the terms of this Agreement. In the event that EPA shall make a claim against all or any

portion of the Escrow Amount by any means other than submission to you of a Release Authorization, you may immediately deposit all or any portion of the Escrow Amount in the Hazardous Substance Superfund, and thereupon you shall be, without any further action on your part or on the part of the undersigned, released from all claims under this Agreement or otherwise as escrow agent as to the portion of the Escrow Amount deposited in the Hazardous Substance Superfund. In addition, you shall comply with the order or judgment of a court of competent jurisdiction regarding disposition of all or any part of the Escrow Amount, and upon such compliance you shall be released from all claims under this Agreement or otherwise as escrow agent with respect to the Escrow Amount or such part of the Escrow Amount. You shall give prompt notice to the undersigned and to EPA of each summons or complaint received by you in which a claim is made against all or any portion of the Escrow Amount. If you shall, pursuant to this Paragraph 5, deposit all of the then-current Escrow Amount with the Court or the Hazardous Substance Superfund, or dispose of all of the then-current Escrow Amount pursuant to the order or judgment of a court of competent jurisdiction, this Agreement shall be deemed to have terminated.

6. Reliance on Documents, etc. You shall be entitled to rely upon any Release Authorization, request or other writing delivered to you hereunder without being required to determine

the authenticity or the correctness of any fact stated therein, the propriety or validity thereof, the authenticity of any signature or the validity of any authorization. You shall have no liability whatsoever for your actions as escrow agent pursuant to this Agreement except for your gross negligence or willful misconduct.

7. Resignation. You may resign your duties at any time in accordance with the provisions of this paragraph. In order to resign your duties hereunder, you shall give notice to the undersigned and to EPA of your intention to resign. If you shall receive, within thirty (30) days after giving such notice, an authorization to transfer the Escrow Amount to a new escrow agent in exactly the form annexed hereto as Exhibit D, with all blanks completed (a "Transfer Authorization"), you shall remit the then-current Escrow Amount to the new escrow agent at the address designated in such Transfer Authorization. If you do not receive a Transfer Authorization within thirty (30) days after giving notice of your intention to resign, you shall remit the then-current Escrow Amount to the Hazardous Substance Superfund at the following address: EPA - Region II, Attn: Superfund Accounting, P.O. Box 360188M, Pittsburgh, PA 15251, or such other address as EPA may have designated in writing. Upon your compliance with the foregoing, you shall be discharged from all further duties and obligations hereunder.

8. Additions to Escrow Amount. The undersigned may deposit additional funds with you under this Agreement whereupon such additional funds shall be added to the Escrow Amount.

9. Third-Party Beneficiary. EPA is a third-party beneficiary under this Agreement. You shall have no liability whatsoever, including no liability to EPA, for your actions as escrow agent pursuant to this Agreement except for your gross negligence or willful misconduct. This Agreement has been reviewed by EPA and is satisfactory to EPA and it is expected to be annexed as Attachment 1 to the Order.

10. Modification and Termination. This Agreement may not be modified or terminated except pursuant to its terms without the written consent of EPA.

11. Notices. Any Release Authorizations, request or other notices (collectively, "Notices") under this Agreement shall be in writing and shall be delivered or sent by certified mail, return receipt requested, postage prepaid, addressed (a) if to the undersigned to the address set forth in the heading of

this Agreement; (b) if to EPA, at the following address:

Chief, Response and Prevention Branch
Emergency and Remedial Response Division
United States Environmental Protection Agency
2890 Woodbridge Avenue
Edison, New Jersey 08837

Attention: Paul L. Kahn, On-Scene Coordinator, Nelson Galvanizing Site

with copies by ordinary mail to:

i. Chief, New York Caribbean Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency
26 Federal Plaza, Room 437
New York, New York 10278

Attention: Michael A. Mintzer, Esq., Nelson Galvanizing Site Attorney

and

ii. Chief, New York/Caribbean Compliance Branch
Emergency and Remedial Response Division
United States Environmental Protection Agency
26 Federal Plaza, Room 747
New York, New York 10278

Attention: Nelson Galvanizing Site Project Manager

and (c) if to you, to the following address:

Berle, Kass & Case
45 Rockefeller Plaza, Suite 2350
New York, N.Y. 10111

Attention: Stephen J. Ritchin, Esq.

Notices shall be deemed given when mailed or delivered as set forth in this paragraph 11. The addresses provided herein may be changed by Notices sent in the manner set forth herein.

If the foregoing correctly sets forth your understanding of the terms of our agreement, please sign in the space indicated below, whereupon this letter shall become a binding agreement among us.

Sincerely,

JOHN T. SWEENEY, JR.

Nelson Galvanizing, Inc. and Nelson Foundry, Inc. are signing this Agreement to signify their agreement to the provisions of Paragraph 4 of this Agreement.

NELSON GALVANIZING, INC.

By:

NELSON FOUNDRY, INC.

By:

Accepted and Agreed:

BERLE, KASS & CASE

By:

8060:017

RELEASE AUTHORIZATION

I hereby authorize and direct Berle, Kass & Case, as escrow agent under the agreement dated March 11, 1991 (the "Agreement"), to release from escrow and pay out the following sum to the following named person or entity:

PAYEE	ADDRESS	AMOUNT

I hereby certify that a copy of the upper portion of this form was sent to EPA as a Notice pursuant to the Agreement and that I have received a return receipt indicating that such copy was received at least seven days prior to the date hereof at the office of Chief, Response and Prevention Branch, Emergency and Remedial Response Division, United States Environmental Protection Agency, Woodbridge Avenue, Edison, New Jersey 08837, Attn: Paul L. Kahn, On-Scene Coordinator, Nelson Galvanizing Site, and that neither Mr. Kahn nor any other representative of the United States Environmental Protection Agency has instructed me not to make the payment described above.

I declare under penalty of perjury that the foregoing is true and correct.

_____
John T. Sweeney, Jr.

DATED: _____, 1991

EXHIBIT B

RELEASE AUTHORIZATION

Reference Administrative Order II-CERCLA-10206

We hereby direct Berle, Kass & Case, as escrow agent under the agreement dated March 11, 1991, to remit the amount of $_____ to the Hazardous Substances Superfund at the following address:

EPA-Region II
Attn: Superfund Accounting
P.O. Box [to be completed by EPA]
Pittsburgh, PA 15251

This payment shall be accompanied by a copy of this document:

To: Hazardous Substance Superfund

Respondents: Nelson Galvanizing, Inc.; Nelson Foundry, Inc. and John Sweeney

Site: Nelson Galvanizing Site

EPA Region: EPA Region II

Order: Administrative Order II CERCLA-10206

U.S. ENVIRONMENTAL PROTECTION AGENCY

[to be signed by the Regional Administrator or Acting Regional Administrator of EPA Region II]

_____
CONSTANTINE SIDAMON-ERISTOFF
Regional Administrator
U.S. Environmental Protection Agency
Region II

Date: _____

CANCELLATION OF RELEASE AUTHORIZATION

We hereby direct Berle, Kass & Case, as escrow agent under the agreement dated March 11, 1991, if it has not already done so, not to pay out the sum identified in the Release Authorization dated _____, 199_, which Release Authorization contains the following information:

Payee	Address	Amount

U.S. ENVIRONMENTAL PROTECTION AGENCY

By:_____

Dated: _____

NGI 7.3034

EXHIBIT D

TRANSFER AUTHORIZATION

We hereby direct and authorize Berle, Kass & Case, as escrow agent under the agreement dated March 11, 1991, to release from escrow and pay out the entire Escrow Amount to the following named person or entity who will act as a successor escrow agent:

PAYEE	ADDRESS

_____
JOHN T. SWEENEY, JR.

Dated: _____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

By: _____

Dated: _____

NGI 7.3035

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

Michael A. Mintzer
Assistant Regional Counsel
TEL: (212) 637-3168
FAX: (212) 637-3115

October 21, 2002

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Anthony D. Pistone, Esq.
Suite 205
163-10 Northern Boulevard
Flushing, NY 11358

Re: Nelson Galvanizing Superfund Site, New York City, Queens County, New York: Request for Information Pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §9601, et seq.

Dear Mr. Pistone:

Following our conversation of Monday, October 21, 2002, enclosed is another copy of EPA's letter dated February 1, 2000 which was addressed to your clients John T. Sweeney, Nelson Galvanizing, Inc. and Nelson Foundry, Inc. and sent to them care of you as counsel.

On February 1, 2000, the United States Environmental Protection Agency ("EPA") wrote to your clients, John T. Sweeney in his individual capacity and also in his capacity as an officer, director and shareholder of Nelson Galvanizing, Inc. and Nelson Foundry, Inc. On February 4, 2000, your office accepted EPA's letter on behalf of your clients. In its February 1, 2000 letter, EPA requested that Mr. Sweeney provide to EPA certain information which related to an environmental cleanup action that EPA was about to undertake at the Nelson Galvanizing facility at 11-02 Broadway in Queens County, New York (the "Nelson Site"), a property owned by Nelson Foundry, Inc., and operated by Nelson Galvanizing, Inc. and by John T. Sweeney, individually.

Both EPA's environmental cleanup action at the Nelson Site, as well as its February 2, 2000 request for information, were authorized by federal law, specifically, the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §9601 *et seq.*, ("CERCLA").

EPA's letter of February 2, 2000, EPA informed your clients that Section 104(e) of CERCLA, 42 U.S.C. §9604(e) provided EPA with the legal authority to require your clients to furnish the requested information and directed that they provide that information to EPA within 21-days of

receipt of EPA's request. EPA's letter also and notified your clients that EPA was authorized by law to seek penalties in the event that they failed to comply with EPA's request.

You and I have spoken numerous times by telephone and we have also corresponded regarding your clients' required response to EPA's February 1, 2000 request for information. You advised me that your client would address EPA's request and would provide the requested information. By letter dated May 23, 2000, you wrote to me and requested additional time for your client to respond to EPA's request for information. By letter dated June 7, 2000, I wrote to you and provided vou. with an additional copy of EPA's request for information, as requested by you, because, you told me, your client had lost the original letter.

EPA believes that your client's continuing failure to comply with EPA's request for information issued pursuant to paragraph (2) of Section 104(e), 42 U.S.C. §104(e)(2) is unreasonable. Your attention is directed to Section 104(e)(5)(B), 42 U.S.C. §9604(e)(5)(B) providing for enforcement options and civil penalties in the event of noncompliance.

Please be advised that EPA would be willing to meet with you and your clients to discuss their legal obligations under Section 104(e) of CERCLA, 42 U.S.C. §104(e), and possible enforcement action which might be instituted by EPA in connection with their failure to provide a response.

Should you wish to meet with EPA, or should you have any questions regarding this matter, please contact Michael A. Mintzer at (212) 637-3168.

Sincerely yours,

Michael A. Mintzer
Assistant Regional Counsel
Office of Regional Counsel

bcc: Jeffrey Bechtel, ERRD, RPB ✓

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

IN THE MATTER OF:	
JOHN T. SWEENEY	SUBPOENA DUCES TECUM SUBPOENA AD TESTIFICANDUM
Proceeding Relating to the Nelson Galvanizing Facility Under Section 122(e)(3)(B) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §9622(e)(3)(B).	Index No. CERCLA-SUB-02-2003-2004

To: JOHN T. SWEENEY
c/o Anthony D. Pistone, Esq.
163-10 Northern Boulevard (Suite 205)
Flushing, NY 11358

(Copy to: JOHN T. SWEENEY
1634 Belmont Ave.
New Hyde Park, NY 11040)

YOU ARE HEREBY REQUIRED, pursuant to the authority of Section 122(e)(3)(B) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. § 9622(e)(3)(B), to APPEAR IN PERSON at the following time and place:

TIME AND DATE: Wednesday, January 8, 2003, 11:00 A.M.
PLACE: Office of United States Environmental Protection Agency
Room 1722, 290 Broadway,
New York City, New York 10007

YOU ARE REQUIRED FURTHER TO TESTIFY then and there upon oath and GIVE TRUTHFUL ANSWERS to all lawful inquiries and questions then and there put to you on behalf of the United States Environmental Protection Agency ("EPA"), and TO REMAIN IN ATTENDANCE until expressly excused by the attorney(s) conducting the proceeding for EPA.

YOU ARE REQUIRED FURTHER TO BRING WITH YOU at the above-stated place and time and then and there produce for inspection and/or copying those items identified and described in the attachment hereto.

You are entitled to claim business confidentiality in accordance with 40 C.F.R. Part 2 over the information that you provide to EPA in response to this subpoena.

NONCOMPLIANCE WITH THIS SUBPOENA MAY SUBJECT YOU TO A CIVIL

ENFORCEMENT ACTION.

U.S. ENVIRONMENTAL PROTECTION AGENCY

Issued at New York City, New York, this 18th day of November, 2002.

Jane M. Kenny
Regional Administrator
U.S. Environmental Protection Agency
Region II
290 Broadway
New York, New York 10007

ATTACHMENT TO SUBPOENA DUCES TECUM AND SUBPOENA AD TESTIFICANDUM IN THE MATTER OF JOHN T. SWEENEY
(Index No. CERCLA-SUB-02-2003-2004)

ITEMS TO BE BROUGHT PURSUANT TO SUBPOENA:

1. Federal income tax returns for John T. Sweeney for 1999, 2000 and 2001.

2. Records relating to title or other ownership of each major asset currently owned in whole or in part by John T. Sweeney or spouse, including, without limitation, records relating to title or ownership of houses or other real estate and/or vehicles.

2. Records relating to transfers by John T. Sweeney of major assets within the last six years, including transfers of houses or other real estate and/or vehicles.

3. Copies of i) the most recent twelve-months of statements from each financial institution (bank, brokerage house, insurance company) where John T. Sweeney (or spouse) has any financial deposit or investment in cash, bonds, stocks, mutual fund or any other financial instrument, and ii) year-end statements for each such account for each year: 1999, 2000, and 2001.

4. Records relating to any indebtedness owed by John T. Sweeney to any person or company or organization, including copies of notes, mortgages, payment receipts and reconciliations.

5. Records relating to income from any source for John T. Sweeney during the years 1999, 2000, 2001 and 2002, including salaries, fee income, rental income, partnership distributions or corporate dividends, and whether received by John T. Sweeney or by any corporation, organization or business entity in which John T. Sweeney has any interest.

6. Records relating to any expense reimbursements and gifts received by John T. Sweeney during the years 1999, 2000, 2001 and 2002 from any source.

7. Records relating to any business activities or any income generating activity conducted by John T. Sweeney during the years 1999, 2000, 2001 and 2002, including any business activity conducted from 11-02 Broadway, Long Island, Queens County, New York.

8. Books and records of Nelson Galvanizing, Inc. for the most recent four-year period or the last four years of any operations of that corporation, including:
   1. Financial records including federal tax returns for the most recent four-year period for which tax returns were filed;
   2. Check registers and cancelled checks for each year from 1999 to the present;
   3. Corporate minute books and stock registers;
   4. Records relating to all payments to John T. Sweeney for any reason, including, without limitation, payments for salary, loans, reimbursements or corporate

payments of personal bills; and
5. Shareholder agreements.

9. Books and records of Nelson Foundry, Inc. for the most recent four-year period or the last four years of any operations of that corporation, including:
   1. Financial records including federal tax returns for the most recent five-year period for which tax returns were filed;
   2. Check registers and cancelled checks for each year from 1991 to the present;
   3. Corporate minute books and stock registers;
   4. Records relating to all payments to John T. Sweeney for any reason, including, without limitation, payments for salary, loans, reimbursements or corporate payments of personal bills; and
   5. Shareholder agreements.

10. Information relating to the use and occupancy of 11-02 Broadway, Queens, New York, including records for each income producing activity at that address, including leases, licenses, garage-use agreements and financial records relating to such use from 1998 to the present.

11. A copy of all liability insurance policies providing coverage for John T. Sweeney, Nelson Galvanizing, Inc. and/or Nelson Foundry, Inc. for all periods from 1998 to the present.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

NGI 7.3041

Michael A. Mintzer
Assistant Regional Counsel
TEL: (212) 637-3168
FAX: (212) 637-3115

December 9, 2002

EXPRESS MAIL–RETURN RECEIPT REQUESTED

Mr. John T. Sweeney
c/o Anthony D. Pistone, Esq.
163-10 Northern Boulevard (Suite 205)
Flushing, NY 11358

Re: Nelson Galvanizing Facility, 11-02 Broadway, Queens County, New York

Dear Mr. Sweeney:

Enclosed you will find Administrative Subpoena, Index No. CERCLA-SUB-02-2003-2004 ("Subpoena"), signed for the Regional Administrator of Region 2 of the United States Environmental Protection Agency ("EPA") requiring that you appear in person to testify at the offices of the Environmental Protection Agency at 290 Broadway, New York, NY on **Wednesday, January 8, 2003 at 11:00 A.M.**. and also requiring that, at such time, you produce those items enumerated in the Subpoena.

As you know, in the Spring of 2000, EPA performed an environmental cleanup action at the Nelson Galvanizing facility at 11-02 Broadway in Queens County, New York (the "Nelson Galvanizing Facility") under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §9601, et seq.("CERCLA"). By letter dated February 1, 2000, EPA notified you individually, Nelson Galvanizing, Inc. and Nelson Foundry, Inc. that it considered each of you to be a potentially responsible party under Section 107(a) of CERCLA, 42 U.S.C. §9607(a) with respect to that environmental response action. By that letter, EPA also sought information from each recipient under the authority of CERCLA Section 104(e), 42 U.S.C. §9604(e). At the request of Anthony Pistone, your counsel, EPA twice sent you additional copies of its February 1, 2000 letter and, despite assurances to EPA from your counsel that you would respond to the questions in the letter, you have failed to do so.

Pursuant to the enclosed Administrative Subpoena, EPA is now requiring that you appear at EPA's New York office at 290 Broadway, New York, NY to answer certain questions and to produce the specified documents. These questions and the required documents concern, among other things, your personal financial ability, and the financial ability of Nelson Galvanizing, Inc. and/or Nelson Foundry, Inc. to pay, in whole or in part, for the response costs incurred by EPA in performing the response action at the Nelson Galvanizing facility.

If you have any questions concerning your obligations pursuant to this subpoena, you may

contact me, or arrange for your counsel to contact me, at 212-637-3168.

Sincerely yours,

Michael A. Mintzer
Assistant Regional Counsel
Office of Regional Counsel

Enclosure

Copy to: John T. Sweeney
1634 Belmont Ave.
New Hyde Park, NY 11040

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

JAN 31 1991

EXPRESS MAIL
RETURN RECEIPT REQUESTED

Mr. John Sweeney
Nelson Galvanizing, Inc. and
Nelson Foundry, Inc.
11-02 Broadway
Long Island City, New York 11106

Re: Request for Consent for Access
Nelson Galvanizing facility

Dear Mr. Sweeney:

I am writing to follow up the telephone call of January 29, 1991 between you, Paul Kahn, On-Scene Coordinator with the Emergency and Remedial Response Division of the United States Environmental Protection Agency ("EPA") and the undersigned and the subsequent telephone call of January 29, 1991 between you and the undersigned. You were called in your capacity as an officer of Nelson Galvanizing, Inc. and/or Nelson Foundry, Inc. (the "Companies") in connection with the facility owned or operated by the Companies and located at 11-02 Broadway, in the County of Queens, City and State of New York (the "Nelson Galvanizing Facility" or the "Facility").

The United States Environmental Protection Agency ("EPA") is charged with responding to the release or threatened release of hazardous substances, pollutants, and contaminants into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601 et seq. EPA has reason to believe that there is a release or threat of release of hazardous substances, pollutants or contaminants at or from the Facility, and has determined that a response action is necessary at the Facility.

During our January 29, 1991 telephone conversations, you were advised that EPA intended to conduct a removal action at the Facility and that EPA could not allow the Companies to carry out the needed actions since EPA was not able to determine that the actions could be properly and promptly done by the Companies. Therefore, the Companies should not undertake the removal or disposal of any hazardous substances, pollutants or contaminants without the written approval of EPA. You were further advised that EPA intends to take the needed response actions at the Facility and you were requested to provide consent for access so

that EPA could undertake those actions. Despite EPA's request, you did not express any willingness, on behalf of the Companies, to grant access to EPA.

Pursuant to Section 104(e)(3) of CERCLA, 42 U.S.C. § 9604(e)(3) EPA is authorized to enter a facility in order to, among other things, conduct a response action.

You were further advised in our January 29, 1991 telephone conversations that the response actions EPA intended to conduct at the Facility would include a removal action to address the hazardous substances, pollutants and contaminants stored at the Facility in drums, open tanks and bins which have been released into the environment or which represent a threat of release into the environment and which are an imminent and substantial danger to the public health and welfare. You were also informed that the response action would include securing the Facility with appropriate enclosures and locks; moving or removing debris to determine whether there are drummed hazardous substances, pollutants or contaminants below such debris; preparing an inventory and waste profile of the chemicals at the Facility; staging, bulking and shipping for disposal, or treating on-site and disposing of hazardous substances, pollutants and contaminants.

By this letter, EPA reiterates its request for access needed to perform the above described response action at the Facility. For reasons including risks to health and safety posed by the proximity of the process operations at the Facility to the area where the response activities will be undertaken, the deteriorated state and precarious placement of barrels containing hazardous substances, the debris blocking ingress and egress to the Facility in the event of any emergency, and the dilapidated condition of the Facility itself, EPA access will require the exclusion of the Companies and all persons claiming right of access by or through the Companies from the Facility during the time of the performance of the removal action. Due to the exigent nature of conditions at the Facility, access is needed as soon as possible so that EPA may undertake the response action. EPA estimates that the removal action will take approximately five months to perform.

Enclosed is a "USEPA Consent to Access" form which may be signed and returned to EPA to memorialize the Companies' consent to access. This form should be returned by express mail or other expedited means of delivery so as to reach EPA by 4:00 P.M. Monday, February 4, 1991. If you do not return the form within the time requested, EPA will conclude that you have failed to grant consent pursuant to this request.

If the Companies fail or refuse to grant consent pursuant to this request, EPA may seek to enforce its statutory access authority

pursuant to Section 104(e) of CERCLA, 42 U.S.C. § 9604(e). In addition, a court may assess a civil penalty not to exceed $25,000 per day for each day of noncompliance for failure to grant entry as required by Section 104(e)(3) of CERCLA, 42 U.S.C. § 9604(e)(3).

Please send the Consent to Access form to the undersigned at the following address:

Michael A. Mintzer
Assistant Regional Counsel
United States Environmental Protection Agency
Room 437
26 Federal Plaza
New York, New York 10278

with a copy to:

Paul Kahn
MS-211
Response and Prevention Branch
Emergency and Remedial Response Division
United States Environmental Protection Agency
2890 Woodbridge Avenue
Edison, New Jersey 08837

In our January 29, 1991 telephone conversation you indicated that the Companies were not represented by an attorney. I urge you to contact me, or should you retain an attorney, to have your attorney contact me at (212) 264-3348 upon your receipt of this letter, if there are any questions regarding its content or otherwise to advise me whether the Companies will grant access by consent.

Very truly yours,

Michael A. Mintzer
Assistant Regional Counsel
Office of Regional Counsel

cc: Joseph Hurley, Senior Attorney, Environment and Natural Resources Division, United States Department of Justice

Paul Weinstein, Assistant U.S. Attorney, Eastern District of New York

NGI 7.4004

USEPA CONSENT TO ACCESS

Name: Nelson Galvanizing, Inc. and Nelson Foundry, Inc.

Address of Facility: 11-02 Broadway, County of Queens, New York City, New York

Consent is hereby given to employees, contractors and authorized representatives of the United States Environmental Protection Agency ("EPA") for immediate entrance and continued access to the above described facility for the following purposes:

- taking such action as determined to be necessary or appropriate to secure the facility including boarding, fencing, changing locks and otherwise restricting access;
- moving or removing debris to determine whether there are drummed hazardous substances, pollutants or contaminants underneath;
- preparing an inventory and waste profile of the chemicals at the facility;
- staging, bulking and shipping for disposal, or treating on-site and disposing of materials;
- taking such other action as may be determined to be necessary or appropriate to perform a removal action, pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601 et seq.

The undersigned acknowledges that EPA has determined that access to the facility will require the exclusion of the undersigned and all persons claiming right of access by or through the undersigned from the facility during the time of the performance of the removal action and consents to comply with such requirement.

Consent for access is given by the undersigned voluntarily with understanding of the right to refuse and without threats or promises of any kind.

Date:_____

Signatures:

Nelson Galvanizing, Inc. Nelson Foundry, Inc.

By_____ By:_____

NOV 0 1 1999

Referral to Criminal Investigation Division - Nelson Galvanizing Inc. (NGI) Facility, Long Island City, N.Y.

George C. Meyer, P.E.,
Chief, RCRA Compliance Branch

William J. Lometti, Special Agent In Charge
Criminal Investigations Division

I am writing to bring to your attention a matter which may require Criminal Investigations Division involvement. It involves what we believe to be negligent and knowing hazardous waste handling violations including, but not limited to, storage of hazardous wastes and raw chemicals for more than five (5) years after the facility president agreed to remove these materials by entering into a consent order with EPA in September, 1994. The order gave him one year to comply with the actions listed in the order, including, but not limited to, the removal of these materials.

The conditions at Nelson Galvanizing represent a potential threat to safety and the environment as releases might continue to occur as a result of deliberate and knowing RCRA non-compliance such as open, corroded, dented, incompatible drums and tanks piled on one another in a haphazard manner. As such, and because of the poor financial status of the facility, we have recently referred the facility to Superfund for characterizing, repacking, and removing the wastes and raw materials. The facility has not operated since the autumn of 1994 and still wastes and chemicals are being stored on-site, even though the facility, for all intents and purposes, is no longer in operation. Recently, we were made aware that Superfund has developed a removal action order and allocated funding for this action and will begin implementing the removal of these materials shortly.

New York City Department of Environmental Protection and the New York City Department of Law have been involved in a case against the alleged president, owner/operator, Mr. John T. Sweeney. These actions were the result of several inspections that the Industrial Waste Unit (IWU) conducted between 1995 and 1996. The IWU referred the case to the Division of Emergency Response and Technical Assessment. NYCDEP issued a summons to Mr. Sweeney answerable in criminal court. The purpose of the summons is to force Mr. Sweeney to clean up the site. Mr. Sweeney appeared in Court and claimed that he could not afford to conduct a site-wide clean up. A hearing was scheduled for August 5, 1999. My staff talked to the attorney for the City in late July at which time there was some thought of dropping the case since what they really wanted (a clean-up) could not be ordered by the Court. The Court can only impose a criminal penalty. We are unclear as to the current status of the case against Mr. Sweeney. NYC Department of Law Attorney Michael Williams is the lead attorney on this case.

We believe that Mr. Sweeney's actions, or should we say inactions, are knowing and deliberate acts of negligence. Granted, the facility and corporation has filed for bankruptcy and there is no money to clean-up the site, but Mr. Sweeny made no effort to contact the Agency to indicate his poor financial status and that financially he and/or his facility could not comply with the terms and conditions of the consent agreement that was reached in 1994. He still supports himself and his worker Jean Luc Lescoat, by renting garage space within the facility and other activities. He and Lescoat still come to the facility every day.

Mr. Sweeney is attempting to disassociate himself from ownership of the facility. He also is/has been attempting to remove himself as president of the alleged defunct corporation. We are not sure of the status of these actions either. We do know that he has refused to accept any mailings (two Notices of Violation and two RCRA § 3007 Information Request Letters) that were addressed to him as president of the facility. We were told in January, 1999 that his lawyer advised him not to accept any certified mailings from EPA directed to him and was particularly advised not to accept any mailings from EPA directed to him as president. However, in September, 1994 he certified that he was fully authorized to enter into the consent decree and signed the document as president. We believe that this might be construed as bad intent and that somehow he might be attempting to falsify or conceal corporate and facility records. He is, in our estimation, not acting in a forthright manner.

With this memo we have enclosed a detailed chronology of administrative environmental activities that have occurred at this facility since 1988. Fifteen (15) documents, representing the major activities that have occurred at the facility since 1991 are also attached, and support this chronology of events. We trust that your review of this material will assist you in deciding whether or not a criminal investigation into the actions of Mr. John T. Sweeney and the facility is warranted.

Needless to say, we believe that your office might want to look into these matters more carefully and make a determination whether or not a criminal investigation should take place. RCB will cooperate with you and your staff in any way that it can. Please don't hesitate to contact me at 4144 or have a member of your staff contact Phil Clappin at 4129 or Phil Flax at 4143 of my staff for any assistance or additional information that you might need.

Enclosure 1
Attachments 1 - 15

cc: Phil Flax, DECA-RCB
Phil Clappin, DECA-RCB
Bruce Sprague, ERRD-RPB

NOTICE OF FEDERAL LIEN

NOTICE IS HEREBY GIVEN by the United States of America that it holds a lien on the lands and all real property and premises described below situated in the State of New York as provided by Section 107(1) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. §9607(1). Nelson Foundry, Inc. was provided with written notice of its potential liability as required by Section 107(1), 42 U.S.C. §9607(1). The lien for which this instrument gives notice exists in favor of the United States upon all real property and rights to such property which belong to Nelson Foundry, Inc., and which are, have been, or will be subject to or affected by removal and remedial actions, as defined by federal law, at the:

REAL PROPERTY LOCATED AT 11-02 BROADWAY, CITY OF NEW YORK, COUNTY OF QUEENS, STATE OF NEW YORK, AND IDENTIFIED ON THE TAX MAP OF THE CITY OF NEW YORK, BOROUGH OF QUEENS SECTION 3, BLOCK 316, LOT 1,

BEING THE SAME PROPERTY conveyed by Clara Klein to Nelson Foundry, Inc. by deed dated November 1, 1954, recorded in the Office of the City Register, Queens County at Liber 6717, page 457,

BUT EXCLUDING THEREFROM such portion thereof as was conveyed by Nelson Foundry, Inc. to Izaak Wilder, Dominick Miranda and Samuel Kleinhaut by deed dated June 3, 1968, recorded June 5, 1968 in the Office of City Register, Queens County at Liber 743, page 453 and by deed dated September 26, 1968, recorded October 1, 1968 in the Office of City Register, Queens County at Liber 280, page 1954,

BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

> ALL those certain lots, pieces or parcels of land with the buildings and improvements thereon erected situate lying and being in the Borough and County of Queens, City and State of New York, bounded and described as follows: BEGINNING at the corner formed by the intersection of the southerly side of Broadway with the easterly side of Boulevard (now known as 11th Street) running thence easterly along the southerly side of Broadway, two hundred sixty-five and fifty-two one-hundredths (265.52) feet more or less to the corner formed by the intersection of the southerly side of Broadway with the westerly side of Sherman Street: (now known as 12th Street) thence southerly along the westerly side of Sherman Street, two hundred and twenty-one one-hundredths (200.21) feet more or less to the corner formed by the intersection of the westerly side of Sherman Street with the northerly side of Ridge Street (now known as 33rd Avenue) thence westerly along the northerly side of Ridge Street, two hundred twenty-seven and eight

tenths (227.8) feet more or less to the corner formed by the intersection of the northerly side of Ridge Street with the westerly side of Boulevard; and thence northerly along the easterly side of Boulevard, two hundred three and sixty-eight one-hundredths (203.68) feet more or less to the point or place of beginning.

BUT EXCLUDING THEREFROM, all those certain plots, pieces or parcels of land, with the buildings and improvements thereon erected, described as follows:

PARCEL "A"
BEGINNING at a point on the southerly side of Broadway, distant 38.44 feet easterly from the corner formed by the intersection of the southerly side of Broadway with the easterly side of 11th Street; running thence easterly along the southerly side of Broadway, 102.12 feet; thence southerly at right angles to the southerly side of Broadway 100.48 feet; thence westerly parallel with the southerly side of Broadway, 102.12 feet to a point; thence northerly at right angles to the southerly side of Broadway, 100.48 feet to the southerly side of Broadway, the point of place of BEGINNING; and

PARCEL "B"
BEGINNING at a point on the southerly side of Broadway, distant 140.56 feet easterly from the corner formed by the intersection of the southerly side of Broadway with the easterly side of 11th Street, running thence easterly along the southerly side of Broadway, 125 feet to the westerly side of 12th Street; thence southerly along the westerly side of 12th Street, 59 feet; thence westerly parallel with the southerly side of Broadway, 125 feet; thence northerly at right angles to the southerly side of Broadway 59 feet to the point or place of BEGINNING; and

PARCEL "C"
BEGINNING at a point on the westerly side of 12th Street, distant 59 feet southerly from the corner formed by the intersection of the westerly side of 12th Street with the southerly side of Broadway; running thence westerly parallel with the southerly side of Broadway, 125 feet; thence southerly parallel with the westerly side of 12th Street, 41.48 feet; thence easterly again parallel with the southerly side of Broadway 125 feet to the westerly side of 12th Street; thence northerly along the westerly side of 12th Street, 41.48 feet to the pont or place of BEGINNING.

This statutory lien secures the repayment of all costs and damages for which Nelson Foundry, Inc., is liable to the United States under Section 107(a) of CERCLA, 42 U.S.C. §9607(a), relating to the

above parcel of real property. This statutory lien exists and continues until the liability for such costs and damages (or for any judgment against said Nelson Foundry, Inc. arising out of such liability) is satisfied or becomes unenforceable through the operation of the statute of limitations as set forth in Section 113 of CERCLA, 42 U.S.C. §9613.

IN WITNESS HEREOF, the United States has caused this instrument to be executed through the United States Environmental Protection Agency, and its attorney, in his official capacity as Regional Counsel of the United States Environmental Protection Agency Region II.

Signed in New York, New York on this 20th day of April, 2000.

By: Walter E. Mugdan

WALTER E. MUGDAN
Regional Counsel
United States Environmental
Protection Agency - Region II
290 Broadway
New York, New York 10007-1866

State of New York)
) ss:
County of New York)

On the 20th day of April, 2000 before me, the subscriber, personally appeared WALTER E. MUGDAN, the Regional Counsel of the United States Environmental Protection Agency, Region II, to me personally known to be the individual whose name is subscribed to the within NOTICE OF FEDERAL LIEN, and he acknowledged to me that he executed the same in his capacity as such Regional Counsel, and that by his signature on the instrument, the United States Environmental Protection Agency, upon whose behalf he acted in signing the within instrument, executed the instrument.

Witness my hand and official seal hereto affixed the day and year written above.

M. Matamoros

Notary Public
State of New York
My commission expires: 8/31/2001

MICHAEL A. MINTZER
NOTARY PUBLIC, STATE OF NEW YORK
NO. 31-2275715
QUALIFIED IN NEW YORK COUNTY
COMMISSION EXPIRES AUGUST 31, 2001

NGI 7.7006

REEL 5586 PG 1134

CITY REGISTER RECORDING AND ENDORSEMENT PAGE
- QUEENS COUNTY -
(This page forms part of the instrument)

WRITE BLOCK & LOT INFORMATION IN BLOCK/LOT FORMAT.
IF ONLY PART OF LOT, WRITE P/O BEFORE LOT NUMBER.

Block/Lot(s): SECTION 3, BLOCK 316, LOT 1

PREMISES: 11-02 BROADWAY, QUEENS

Title/Agent Company Name:

Title Company Number:

TOTAL NUMBER OF PAGES IN DOCUMENT **INCLUDING** THIS PAGE: ____

RECORD & RETURN TO:

NAME ▼ MICHAEL MINTZER
U.S.E.P.A

ADDRESS ▼
290 BROADWAY, 17TH FLOOR

CITY ▼ NEW YORK | STATE ▼ NY | ZIP ▼ 10007

OFFICE USE ONLY - DO NOT WRITE BELOW THIS LINE

THE FOREGOING INSTRUMENT WAS ENDORSED FOR THE RECORD AS FOLLOWS:

Examined by (✍): _____

Mtge Tax Serial No.	
Mtge Amount	$
Taxable Amount	$

Exemption (✓) ..... YES ☐ NO ☐

Type: CIRCLE ONE ☞ [339EE] [255] [OTHER ____]

Dwelling Type: CIRCLE ONE ☞ [1 to 2] [3] [4 to 6] [OVER 6]

TAX RECEIVED ON ABOVE MORTGAGE ▼

County (basic)	$
City (Addt'l)	$
Spec Addt'l	$
TASF	$
MTA	$
NYCTA	$
TOTAL TAX	$

Apportionment Mortgage (✓) YES ☐ NO ☐

Joy A. Bobrow, City Register

City Register Serial Number → 052281

Indexed By (✍): _____ Verified By (✍): _____

Block(s) and Lot(s) verified by (✓): D

Address ☑ Tax Map ☐

Extra Block(s) _____ Lot(s) _____

Recording Fee B	$37
Affidavit Fee (C)	$
TP-584/582 Fee (Y)	$
RPTT Fee (R)	$

HPD-A ☐ HPD-C ☐

New York State Real Estate Transfer Tax ▼
$

Serial Number →

New York City Real Property Transfer Tax Serial Number →

New York State Gains Tax Serial Number →

RECEIPT DATE
MAY 11-00

RECORDED IN QUEENS COUNTY
OFFICE OF THE CITY REGISTER
2000 MAY 11 P 12:34

Witness My Hand and Official Seal

City Register

CRGFM89Q.BPG 12/99

46 - H - 002

NOTICE OF PUBLIC AVAILABILITY

The United States Environmental Protection Agency (EPA) announces the availability for public review of files comprising the administrative record for the selection of the removal action at the Nelson Galvanizing Site. The EPA seeks to inform the public of the availability of the record file at this repository and to encourage the public to comment on documents as they are placed in the record file.

The administrative record file includes documents which form the basis for the selection of a removal action at this site. Documents now in the record file include: Action Memorandum, Sampling Plan, Trip Reports, and the EPA regional guidance documents list. Other documents may be added to the record files as they become available. These additional documents may include, but are not limited to, other technical reports, validated sampling data, comments, and new data submitted by interested persons, and the EPA responses to significant comments.

The administrative record files are available for review during normal business hours at:

Queens Borough Public Library, Ravenswood Branch
35-32 21 Street
Long Island City, NY 11106
(718) 784-2112

U.S. EPA - Region II
Response and Prevention Branch
2890 Woodbridge Avenue
Edison, NJ 08837
(732) 906-6807

Additional guidance documents and technical literature is available at the following location:

U.S. EPA - Region II
Removal Records Center
2890 Woodbridge Avenue
Edison, NJ 08837
(732) 906-6980

Written comments on the Administrative Record should be sent to:

Jeff M. Bechtel
On-Scene Coordinator
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Waste-by-rail
2 firms will explore moving waste by rail in the West/Page 11

WASTETECH NE

APRIL 22, 1991

The Newspaper for the Waste and Pollution Control Industrie

New York

Long Island City—Nelson Galvanizing was given a federal order last month by the U.S. EPA to clean up its facility here in case of a chemical incident due to improper handling of hazardous substances.

EPA collaborated with the New York City Department of Environmental Protection (NYCDEP) to bring about the cleanup, the agency said.

Nelson Galvanizing agreed to sign a consent order with EPA outlining the terms of the cleanup, the agency said.

According to an EPA news release, preliminary evaluation of the site revealed as much as 10,000 to 15,000 gallons of bulked acids and caustic materials were being stored in leaking and corroded containers, stacked in haphazard and precarious fashion.

Metcalf & Eddy Cos. Inc. is conducting the cleanup for Nelson Galvanizing and John Sweeney, company president, could not estimate how much the work would cost.

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United States
Environmental Protection Agency
Region 2: New Jersey, New York
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NEWS

91(48) EPA -Rich Cahill (212) 264-2515
NYCDEP-Ian Michaels " 669-8381

FOR RELEASE:

EPA ORDERS LONG ISLAND CITY FIRM TO CLEAN UP CHEMICAL HAZARDS

NEW YORK, N.Y. -- In response to a Federal order, the owners/operators of the Nelson Galvanizing facility at 11-02 Broadway in Long Island City, New York have hired a cleanup firm to reduce the threat of a chemical incident due to the improper handling of hazardous substances at the facility. The U.S. Environmental Protection Agency (EPA) has been working closely with the New York City Department of Environmental Protection (NYCDEP) to bring about a cleanup of the facility.

The Nelson Galvanizing Company facility is characterized by hazardous conditions and has a history of chemical spills. The company has now agreed to sign a consent order with EPA the terms of which address the cleanup procedures and responsibilities.

If the owners/operators had not agreed to the terms of the order, EPA was ready to undertake the work using Superfund, the federal program to clean up sites that pose an existing or potential chemical threat to the public and/or the environment.

EPA Regional Administrator Constantine Sidamon-Eristoff said, "The chemicals and conditions inside have created a high potential for a release of dangerous substances into the environment. EPA and New York City officials will oversee the cleanup operation and monitor the work inside the building very closely. It is our policy that those responsible for creating a problem such as this must pay to correct it," Eristoff added.

New York City Department of Environmental Protection Commissioner Albert F. Appleton said, "Through a pattern of neglect and disregard for public health, the owners and operators of the Nelson Galvanizing facility in Long Island City have created an environmental situation which requires immediate cleanup action. Repeated orders from the city to take extensive measures to remedy the situation have been largely ignored by Nelson

Galvanizing. The city and federal governments are now cooperating to bring about a positive and constructive response from Nelson Galvanizing, and at this time it appears to be working. We shall continue to work with EPA until a full cleanup of the Nelson Galvanizing site has been completed."

These individuals are now fully cooperating with federal and city agencies to remove the hazardous chemicals.

EPA's preliminary evaluations of the site revealed that as much as 10,000 to 15,000 gallons of bulked acids and caustic materials were being stored in leaking and corroded containers, stacked in a haphazard and precarious fashion.

Under the terms of EPA's order, the Nelson Galvanizing, Inc., Nelson Foundry, Inc. and John T. Sweeney, Jr. agreed to direct their cleanup contractor to use an expeditious, sequenced approach to the problems posed by the site: first, detailed site assessment and chemical identification, then sampling to characterize type and concentration of materials. This will be followed by contractual arrangements for proper off-site disposal and then staging for actual removal and shipment to permitted disposal facilities.

EPA estimates that it will take up to 6 months for the company's contractors to complete this cleanup of the facility.

SITE DESCRIPTION

The site is an active metal galvanizing facility that has been the subject of NYCDEP enforcement efforts since 1988. Past spills and ongoing releases from deteriorated drums and tanks are evidenced by stains, puddles and corrosion inside and outside the building. In 1988, the NYCDEP was obliged to undertake extensive repairs to the adjacent sidewalk and storm drains due to acidic releases believed to have orginated from the site which undermined these structures. The facility owners/operators had responded insufficiently to a City cleanup order aimed at reducing the hazardous conditions at the facility.

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EPA REGIONAL GUIDANCE DOCUMENTS

The following documents are available for public review at the EPA Region II Field Office, 2890 Woodbridge Avenue, Edison, New Jersey 08837 during regular business hours.

* Glossary of EPA Acronyms.

* Superfund Removal Procedures--Revision #3. OSWER Directive 9360.0-03B, February 1988.

* Hazardous Waste Operations and Emergency Response.
Notice of Proposed Rule making and Public Hearings.
29 CFR Part 1910, Monday, August 10, 1987.

* Guidance on Implementation of Revised Statutory Limits on Removal Action. OSWER Directive 9260.0-12, May 25, 1988.

* Redelegation of Authority under CERCLA and SARA.
OSWER Directive 9012.10, May 25, 1988.

* Removal Cost Management Manual.
OSWER Directive 9360.0-02B, April, 1988.

* Field Standard Operating Procedures (FSOP).
#4 Site Entry.
#6 Work Zones.
#8 Air Surveillance.
#9 Site Safety Plan.

* Standard Operating Safety Guides -- U.S. EPA Office of Emergency and Remedial Response, July 5, 1988.

* CERCLA Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (Superfund).

* SARA: Superfund Amendments and Reauthorization Act of 1986.

* NCP: National Oil and Hazardous Substances Pollution Contingency Plan. - Publication No. 9200.2-14.

* Guidance on Implementation of the "Contribute to Efficient Remedial Performance" Provision - Publication No. 9360.0-13.

Additional Guidance Documents are listed below and are available for review at the EPA Region II Removal Records Center.

* The Role of Expedited Response Actions (EPA) Under SARA - Publication No. 9360.0-15.

* Guidance on Non-NPL Removal Actions Involving Nationally Significant or Precedent Setting Issues - Publication No. 9360.0-19.

* ARARS During Removal Actions - Publication No. 9360.3-02.

* Consideration of ARARS During Removal Actions -Publication No. 9360.3-02FS.

* Public Participation for OSCs - Community Relations and the Administrative Record - Publication No.9360.3-05.

* Superfund Removal Procedures - Removal Enforcement Guidance for On-Scene Coordinators - Publication No. 9360.3-06.

* QA/QC for Removal Actions - Publication No. 9360.4-01.

* Compendium for ERT Air Sampling Procedures - Publication No. 9360.4-05.